

90-890000442



CONTAINS NO CBI  
RECEIVED  
7/17

Chevrolet-Pontiac-Canada Group  
Marion Plant  
General Motors Corporation  
P.O. Box 778  
Marion, Indiana 46952-0036

July 5, 1989

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Office of Toxic Substances  
Environmental Protection Agency  
401 M. Street, S.W.  
Washington, DC 20460

SUBJECT: Comprehensive Assessment Information Rule (CAIR)  
Report

Dear Sir or Madame:

Attached is the Comprehensive Assessment Information Rule (CAIR) Report. It is unclear under the regulations if this report is required for our activities. We do not believe we are required to file this report; however, we are providing the report for informational purposes.

Sincerely,

  
Theodore E. Diwald  
Plant Manager

HWB/TED:tmr

Encl.

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OFFICE

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ECAP  
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Form Approved  
OMB No. 2010-0019  
Approval Expires 12-31-89



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Comprehensive Assessment Information Rule  
REPORTING FORM

When completed, send this form to:

Document Processing Center  
Office of Toxic Substances, TS-790  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460  
Attention: CAIR Reporting Office

For Agency Use Only:

Date of Receipt: \_\_\_\_\_

Document  
Control Number: \_\_\_\_\_

Docket Number: \_\_\_\_\_

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been completed in response to the Federal Register Notice of..... [1][2] [2][2] [8][8]  
CBI mo. day year

☐ a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. .... [2][6][4][7][1]-[6][2]-[5]

b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.

(i) Chemical name as listed in the rule ..... \_\_\_\_\_

(ii) Name of mixture as listed in the rule .... \_\_\_\_\_

(iii) Trade name as listed in the rule ..... \_\_\_\_\_

c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.

Name of category as listed in the rule ..... Group B2

CAS No. of chemical substance ..... [2][6][4][7][1]-[6][2]-[5]

Name of chemical substance ..... Toluens Diisocyanate

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

CBI Manufacturer ..... 1

☐ Importer ..... 2

Processor ..... 3

X/P manufacturer reporting for customer who is a processor ..... 4

X/P processor reporting for customer who is a processor ..... 5

☐ Mark (X) this box if you attach a continuation sheet.

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI

☒ Yes ..... ☐ Go to question 1.04

☐

No ..... ☐ Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI

Yes ..... 1

☐

☒ No ..... 2

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s) ....

☐ You have chosen to report for your customers

☐ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI

Trade name ..... Mondur 531

☐

Is the trade name product a mixture? Circle the appropriate response.

Yes ..... 1

☒ No ..... 2

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI

"I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

Theodore Diewald

NAME

  
SIGNATURE

6-23-89

DATE SIGNED

Plant Manager

TITLE

( 317 ) 668 - 2065

TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

- 1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission.

CBI

☐

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

_____ NAME	_____ SIGNATURE	_____ DATE SIGNED
_____ TITLE	(_____) - TELEPHONE NO.	_____ DATE OF PREVIOUS SUBMISSION

"Not Applicable at present"

- 1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI

☐

"My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position."

_____ NAME	_____ SIGNATURE	_____ DATE SIGNED
_____ TITLE	(_____) - TELEPHONE NO.	

☐ Mark (X) this box if you attach a continuation sheet.

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PART B CORPORATE DATA

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1.09 Facility Identification

CBI Name [G][M][C]-[C][P][C]-[G][R][O][U][P]-[M][A][R][I][O][N]-[P][L][A][N][T]

[ ] Address [2][4][0][0]-[W][e][s][t]-[S][e][c][o][n][d]-[S][t][r][e][e][t]-[ ]  
Street

[M][a][r][i][o][n]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]-[ ]  
City

[I][N] [4][6][9][5][2]--[0][0][3][6]  
State Zip

Dun & Bradstreet Number .....[1][4]-[6][4][7]-[9][0][3][5]

EPA ID Number .....IND.[0][0][0][7][1][5][0][8][6]

Employer ID Number .....[3][8]-[0][5][7][2][5]

Primary Standard Industrial Classification (SIC) Code .....[3][4][1][2]

Other SIC Code .....[ ][ ][ ][ ]

Other SIC Code .....[ ][ ][ ][ ]

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1.10 Company Headquarters Identification

CBI Name [G][M]-[C][P][C]-[H][e][a][d][q][u][a][r][t][e][r][s]-[ ][ ][ ][ ][ ][ ][ ][ ][ ]

[ ] Address [3][0][0][1]-[V][a][n][D][y][k]-[A][v][e][n][u][e]-[ ][ ][ ][ ][ ][ ][ ][ ][ ]  
Street

[W][a][r][r][e][n]-[ ]  
City

[M][I] [4][8][0][9][0]--[9][2][2][0]  
State Zip

Dun & Bradstreet Number .....[0][1]-[7][4][3]-[4][2][2][0]

Employer ID Number .....[ ][ ][ ][ ][ ][ ][ ][ ][ ]

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[ ] Mark (X) this box if you attach a continuation sheet.

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### 1.11 Parent Company Identification

[illegible]

## 1.12 Technical Contact

```
CBI   Name   [H][o][w][a][r][d][ ][W][ ][B][r][i][n][k][e][r][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
[ ][ ] Title [E][n][v][i][r][o][n][m][e][n][t][a][l][ ][E][n][g][i][n][e][e][r][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
Address  [2][4][0][0][ ][W][e][s][t][ ][S][e][c][o][n][d][ ][S][t][r][e][e][t][ ][ ][ ]
                                     Street
[M][a][r][i][o][n][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
                                               City
[I][N]      [4][6][9]5[2]--[0][0][3][6]
State       Zip
Telephone Number .....[3][1][7]-[6][6][2]-[2][2][1][5]
```

1.13 This reporting year is from .....  $\begin{bmatrix} 0 \\ \text{Mo.} \end{bmatrix} \begin{bmatrix} 1 \\ \text{Year} \end{bmatrix}$  to  $\begin{bmatrix} 1 \\ \text{Mo.} \end{bmatrix} \begin{bmatrix} 2 \\ \text{Year} \end{bmatrix}$   $\begin{bmatrix} 8 \\ \text{Mo.} \end{bmatrix} \begin{bmatrix} 8 \\ \text{Year} \end{bmatrix}$

☐ Mark (X) this box if you attach a continuation sheet.

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      *N/A
CBI   Name of Seller [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
[ ][ ] Mailing Address  [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
                                   Street
                                [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
                                           City
                               [ ][ ][ ]    [ ][ ][ ][ ][ ][ ][ ]--[ ][ ][ ][ ][ ]
                                  State          Zip
Employer ID Number .....[ ][ ][ ][ ][ ][ ][ ][ ][ ]
Date of Sale .....[ ][ ][ ] [ ][ ][ ] [ ][ ][ ]
                              Mo.     Day       Year
Contact Person [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
Telephone Number .....[ ][ ][ ]-[ ][ ][ ]-[ ][ ][ ][ ][ ]

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      *N/A

CBI   Name of Buyer  ([ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ])
([ ]) Mailing Address ([ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ])
                               Street
                        ([ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ])
                               City
                                ([ ][ ]) ([ ][ ][ ][ ][ ]) -- ([ ][ ][ ][ ])
                               State       Zip

Employer ID Number ..... ([ ][ ][ ][ ][ ][ ][ ][ ][ ])
Date of Purchase ..... ([ ][ ] [ ][ ] [ ][ ])
                              Mo.    Day    Year

Contact Person ([ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ])
Telephone Number ..... ([ ][ ][ ]) - ([ ][ ][ ]) - ([ ][ ][ ][ ])

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8



1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

<u>Classification</u>	<u>Quantity (kg/yr)</u>
<input type="checkbox"/> Manufactured .....	_____
Imported .....	_____
Processed (include quantity repackaged) .....	255,000.kg
Of that quantity manufactured or imported, report that quantity:	
In storage at the beginning of the reporting year .....	19047 kg
For on-site use or processing .....	14285 kg
For direct commercial distribution (including export) .....	_____
In storage at the end of the reporting year .....	19047 kg
Of that quantity processed, report that quantity:	
In storage at the beginning of the reporting year .....	19047 kg
Processed as a reactant (chemical producer) .....	_____
Processed as a formulation component (mixture producer) .....	_____
Processed as an article component (article producer) .....	N/A
Repackaged (including export) .....	_____
In storage at the end of the reporting year .....	19047 kg

☐ Mark (X) this box if you attach a continuation sheet.

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PART C IDENTIFICATION OF MIXTURES

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- 1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

CBI

☐

Component Name	Supplier Name	Average % Composition by Weight (specify precision, e.g., 45% ± 0.5%)
Tolnene Dusocyanote	Mobay Corp.	70.80
Diphenylmethane Dusocyanote	Mobay Corp.	20
		100
		Total 100%

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☐ Mark (X) this box if you attach a continuation sheet.

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2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending ..... [1][2] [8][5]  
Mo. Year

Quantity manufactured ..... kg

Quantity imported ..... kg

Quantity processed ..... 451,492 kg

Year ending ..... [1][2] [8][4]  
Mo. Year

Quantity manufactured ..... kg

Quantity imported ..... kg

Quantity processed ..... 367,477 kg

Year ending ..... [1][2] [8][3]  
Mo. Year

Quantity manufactured ..... kg

Quantity imported ..... kg

Quantity processed ..... 384,904 kg

2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI \*N/A

☐ Continuous process ..... 1

Semicontinuous process ..... 2

Batch process ..... 3

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types.

- ☐ Continuous process ..... 1
- Semicontinuous process ..... 2
- Batch process ..... 3

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.)

- ☐ Manufacturing capacity ..... kg/yr
- Processing capacity ..... 228571 kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume.

<input type="checkbox"/>	Manufacturing Quantity (kg)	Importing Quantity (kg)	Processing Quantity (kg)
Amount of increase			N/A
Amount of decrease			N/A

☐ Mark (X) this box if you attach a continuation sheet.

2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

☐

	<u>Days/Year</u>	<u>Average Hours/Day</u>
--	------------------	------------------------------

Process Type #1 (The process type involving the largest quantity of the listed substance.)

Manufactured .....	_____	_____
Processed .....	240	16

Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)

Manufactured .....	_____	_____
Processed .....	N/A	N/A

Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)

Manufactured .....	_____	_____
Processed .....	N/A	N/A

\*Response not required for TD1

2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

☐

Maximum daily inventory .....	_____	kg
Average monthly inventory .....	_____	kg

☐ Mark (X) this box if you attach a continuation sheet.

- 2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI

☐

<u>CAS No.</u>	<u>Chemical Name</u>	<u>Byproduct, Coproduct or Impurity<sup>1</sup></u>	<u>Concentration (%) (specify ± % precision)</u>	<u>Source of By-products, Coproducts, or Impurities</u>
26447-40-5	Diphenylmethane Diisocyanate	C	5-15%	Mixture

<sup>1</sup>Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct  
C = Coproduct  
I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

- 2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types <sup>1</sup>	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users <sup>2</sup>
B	100	50	CS

<sup>1</sup>Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

<sup>2</sup>Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

- 2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types <sup>1</sup>	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users <sup>2</sup>
B	100	50	CS

<sup>1</sup>Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

<sup>2</sup>Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.



2.14 Final Product -- Complete the following table for each type of final product manufactured, imported, or processed at your facility that contains the listed substance other than as an impurity.

☐

a.	b.	c.	d.
Product Type <sup>1</sup>	Final Product's Physical Form <sup>2</sup>	Average % Composition of Listed Substance in Final Product	Type of End-Users <sup>3</sup>
N/A	N/A	N/A	N/A

<sup>1</sup>Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

<sup>2</sup>Use the following codes to designate the final product's physical form:

A = Gas	F2 = Crystalline solid
B = Liquid	F3 = Granules
C = Aqueous solution	F4 = Other solid
D = Paste	G = Gel
E = Slurry	H = Other (specify) _____
F1 = Powder	

<sup>3</sup>Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the  
CBI listed substance to off-site customers.

☐ Truck ..... 1  
Railcar ..... 2  
Barge, Vessel ..... 3  
Pipeline ..... 4  
Plane ..... 5  
Other (specify) N/A ..... 6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers  
CBI or prepared by your customers during the reporting year for use under each category  
of end use listed (i-iv).

☐

Category of End Use

i. Industrial Products

Chemical or mixture ..... N/A kg/yr  
Article ..... N/A kg/yr

ii. Commercial Products

Chemical or mixture ..... N/A kg/yr  
Article ..... N/A kg/yr

iii. Consumer Products

Chemical or mixture ..... N/A kg/yr  
Article ..... N/A kg/yr

iv. Other

Distribution (excluding export) ..... N/A kg/yr  
Export ..... N/A kg/yr  
Quantity of substance consumed as reactant ..... N/A kg/yr  
Unknown customer uses ..... N/A kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

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SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

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PART A GENERAL DATA

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- 3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.  
CBI The average price is the market value of the product that was traded for the listed substance.

☐

<u>Source of Supply</u>	<u>Quantity (kg)</u>	<u>Average Price (\$/kg)</u>
The listed substance was manufactured on-site.	N/A	
The listed substance was transferred from a different company site.	N/A	
The listed substance was purchased directly from a manufacturer or importer.	171428	43¢
The listed substance was purchased from a distributor or repackager.	N/A	
The listed substance was purchased from a mixture producer.	N/A	

- 3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

☐

☒ Truck ..... 1  
Railcar ..... 2  
Barge, Vessel ..... 3  
Pipeline ..... 4  
Plane ..... 5  
Other (specify) \_\_\_\_\_ 6

---

☐ Mark (X) this box if you attach a continuation sheet.

---

3.03 a. Circle all applicable containers used to transport the listed substance to your facility.  
CBI

☐

Bags ..... 1  
Boxes ..... 2  
Free standing tank cylinders ..... 3  
Tank rail cars ..... 4  
Hopper cars ..... 5  
Tank trucks ..... 6  
Hopper trucks ..... 7  
Drums ..... 8  
Pipeline ..... 9  
Other (specify) ..... 10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders ..... mmHg  
Tank rail cars ..... mmHg  
Tank trucks ..... N/A None mmHg

☐ Mark (X) this box if you attach a continuation sheet.

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PART B RAW MATERIAL IN THE FORM OF A MIXTURE

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3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

CBI

☐

<u>Trade Name</u>	<u>Supplier or Manufacturer</u>	<u>Average % Composition by Weight (specify <math>\pm</math> % precision)</u>	<u>Amount Processed (kg/yr)</u>
N/A	N/A	N/A	N/A

---

☐ Mark (X) this box if you attach a continuation sheet.

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PART C RAW MATERIAL VOLUME

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3.05 State the quantity of the listed substance used as a raw material during the  
CBI reporting year in the form of a class I chemical, class II chemical, or polymer, and  
the percent composition, by weight, of the listed substance.

☐

	Quantity Used (kg/yr)	% Composition by Weight of Listed Sub- stance in Raw Material (specify $\pm$ % precision)
Class I chemical	255,000	80%
Class II chemical		
Polymer		

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☐ Mark (X) this box if you attach a continuation sheet.

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## SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

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### General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

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### PART A PHYSICAL/CHEMICAL DATA SUMMARY

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- 4.01 Specify the percent purity for the three major<sup>1</sup> technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

[ ]

Unknown	<u>Manufacture</u>	<u>Import</u>	<u>Process</u>
Technical grade #1	_____ % purity	_____ % purity	_____ % purity
Technical grade #2	_____ % purity	_____ % purity	_____ % purity
Technical grade #3	_____ % purity	_____ % purity	_____ % purity

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<sup>1</sup>Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes ..... 1  
No ..... 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company ..... 1

Another source ..... Mobay Chemical ..... 2

[ ]

Mark (X) this box if you attach a continuation sheet.

# MATERIAL SAFETY DATA SHEET

**Mobay Corporation**  
A Bayer USA Inc. Company

DIVISION ADDRESS



MOBAY CORPORATION  
Polyurethane Division  
Mobay Road  
Pittsburgh, PA 15205-9741

ISSUE DATE  
SUPERSEDES

6/15/87  
12/26/85

TRANSPORTATION EMERGENCY: CALL CHEMTREC  
TELEPHONE NO: 800-424-9300; DISTRICT OF COLUMBIA: 202-483-7616

MOBAY NON-TRANSPORTATION EMERGENCY NO.:  
(412) 923-1800

## I. PRODUCT IDENTIFICATION

PRODUCT NAME.....: Mondur 531  
PRODUCT CODE NUMBER.....: E-531  
CHEMICAL FAMILY.....: Aromatic Isocyanate  
CHEMICAL NAME.....: Toluene Diisocyanate (TDI) - Diphenylmethane Diisocyanate (MDI) Blend  
CAS NUMBER.....: 26471-62-5 and 9016-87-9  
T.S.C.A. STATUS.....: Mixture - On Inventory  
OSHA HAZARD COMMUNICATION STATUS.....: This product is hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29 CFR 1910.1200.  
CHEMICAL FORMULA.....: Not Applicable

## II. HAZARDOUS INGREDIENTS

COMPONENTS:	Z:	OSHA-PEL	ACGIH-TLV
Toluene Diisocyanate (TDI) CAS# 26471-62-5	70-80	0.02 ppm Ceiling	0.005 ppm TWA 0.02 ppm STEL
Diphenylmethane Diisocyanate (MDI) CAS# 26447-40-5	5-15	0.02 ppm Ceiling	0.02 ppm Ceiling

## III. PHYSICAL DATA

APPEARANCE.....: Liquid  
COLOR.....: Amber-Brown  
ODOR.....: Sharp, Pungent  
ODOR THRESHOLD.....: Greater than the TLV of 0.005 ppm  
MOLECULAR WEIGHT.....: Not Applicable  
MELT POINT/FREEZE POINT...: Not Established for the blend; 55°F (13°C) for TDI  
BOILING POINT.....: Not Established for the blend; 484°F (251°C) for TDI  
VAPOR PRESSURE.....: Not Established for the blend; 0.025 mmHg @ 77°F (25°C) for TDI  
VAPOR DENSITY (AIR=1).....: 6.0 for TDI  
SPECIFIC GRAVITY.....: 1.22 @ 77°F (25°C)  
BULK DENSITY.....: 10.18 lbs/gal  
SOLUBILITY IN WATER.....: TDI and MDI react slowly with water at normal room temperature to liberate CO<sub>2</sub> gas.  
% VOLATILE BY VOLUME.....: Negligible

Product Code: E-531

Page 1 of 8



#### IV. FIRE & EXPLOSION DATA

FLASH POINT °F(°C).....: 275°F (135°C) Pensky-Martens Closed Cup

##### FLAMMABLE LIMITS -

Lel.....: 0.9% for TDI; not established for the blend

Uel.....: 9.5% for TDI; not established for the blend

EXTINGUISHING MEDIA.....: Dry chemical (e.g. monoammonium phosphate, potassium sulfate, and potassium chloride), carbon dioxide, high expansion (proteinic) chemical foam, water spray for large fires. Caution: Reaction between water or foam and hot TDI can be vigorous.

##### SPECIAL FIRE FIGHTING PROCEDURES/UNUSUAL FIRE OR EXPLOSION HAZARDS:

Full emergency equipment with self-contained breathing apparatus and full protective clothing (such as rubber gloves, boots, bands around legs, arms and waist) should be worn by fire fighters. No skin surface should be exposed. During a fire, TDI and MDI vapors and other irritating, highly toxic gases may be generated by thermal decomposition or combustion. (See Section VIII). At temperatures greater than 350°F (177°C) TDI and MDI form carbodiimides with the release of CO<sub>2</sub> which can cause pressure build-up in closed containers. Explosive rupture is possible. Therefore, use cold water to cool fire-exposed containers.

#### V. HUMAN HEALTH DATA

##### PRIMARY ROUTE(S) OF

ENTRY.....: Inhalation of vapors or aerosols. Skin Contact from liquid, vapors or aerosols.

EFFECTS AND SYMPTOMS OF OVEREXPOSURE - Data have not been established for the blend. Data listed are for the individual MDI and TDI components.

##### INHALATION:

Acute Exposure. TDI or MDI vapors, mist, or aerosols at concentrations above the TLV can irritate (burning sensation) the mucous membranes in the respiratory tract (nose, throat, lungs) causing runny nose, sore throat, coughing, chest discomfort, shortness of breath and reduced lung function (breathing obstruction). Persons with a preexisting, nonspecific bronchial hyperactivity can respond to concentrations below the TLV with similar symptoms as well as asthma attack. Exposure well above the TLV may lead to bronchitis, bronchial spasm and pulmonary edema (fluid in lungs). These effects are usually reversible. Chemical or hypersensitive pneumonitis, with flu-like symptoms (e.g., fever, chills), has also been reported. These symptoms can be delayed up to several hours after exposure.

Chronic Exposure. As a result of previous repeated overexposures or a single large dose, certain individuals may develop isocyanate sensitization (chemical asthma) which will cause them to react to a later exposure to isocyanate at levels well below the TLV. These symptoms, which can include chest tightness, wheezing, cough, shortness of breath or asthmatic attack, could be immediate or delayed up to several hours after exposure. Similar to many non-specific asthmatic responses, there are reports that once sensitized an individual can experience these symptoms upon exposure to dust, cold air or other irritants. This

## V. HUMAN HEALTH DATA (Continued)

increased lung sensitivity can persist for weeks and in severe cases for several years. Chronic overexposure to isocyanate has also been reported to cause lung damage (including decrease in lung function) which may be permanent. Sensitization can either be temporary or permanent.

### SKIN CONTACT

**Acute Exposure.** Isocyanates react with skin protein and moisture and can cause irritation which may include the following symptoms: reddening, swelling, rash, scaling or blistering. Cured material is difficult to remove.

**Chronic Exposure.** Prolonged contact can cause reddening, swelling, rash, scaling, blistering, and, in some cases, skin sensitization. Individuals who have developed a skin sensitization can develop these symptoms as a result of contact with very small amounts of liquid material or as a result of exposure to vapor.

### EYE CONTACT

**Acute Exposure.** Liquid, aerosols or vapors are severely irritating and can cause pain, tearing, reddening and swelling. If left untreated, corneal damage can occur and injury is slow to heal. However, damage is usually reversible. See Section VI for treatment.

**Chronic Exposure.** Prolonged vapor contact may cause conjunctivitis.

### INGESTION

**Acute Exposure.** Can result in irritation and corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

**Chronic Exposure.** None found.

### MEDICAL CONDITIONS

**AGGRAVATED BY EXPOSURE...** Asthma, other respiratory disorders (bronchitis, emphysema, bronchial hyperactivity), skin allergies, eczema.

**CARCINOGENICITY.....** Neither MDI nor polymeric MDI are listed by the NTP, IARC or regulated by OSHA as carcinogens. For TDI, no carcinogenic activity was observed in lifetime inhalation studies in rats and mice (International Isocyanate Institute).

**NTP.....** The National Toxicology Program reported that TDI caused an increase in the number of tumors in exposed rats over those counted in non-exposed rats. The TDI was administered in corn-oil and introduced into the stomach through a tube. Based on this study, the NTP has listed TDI as a substance that may reasonably be anticipated to be a carcinogen in its Fourth Annual Report on Carcinogens.

**IARC.....** IARC has announced that it will list TDI as a substance for which there is sufficient evidence for its carcinogenicity in experimental animals but inadequate evidence for the carcinogenicity of TDI to humans (IARC Monograph 39).

**OSHA.....** TDI is not regulated as a carcinogen.

**EXPOSURE LIMITS** - Exposure limits have been established for the blend. Use the exposure limits listed below and in Section II for the individual MDI and TDI components.

**OSHA PEL.....** 0.02 ppm Ceiling for TDI and MDI

**ACGIH TLV.....** 0.005 ppm TWA/0.02 ppm STEL for TDI  
0.02 ppm Ceiling for MDI. However, ACGIH has proposed lowering the TLV for MDI to 0.005 ppm TWA in its 1986-1987 Notice of Intended Changes.

## VI. EMERGENCY & FIRST AID PROCEDURES

**EYE CONTACT.....:** Flush with copious amounts of water, preferably lukewarm for at least 15 minutes holding eyelids open all the time. Refer individual to physician or an ophthalmologist for immediate follow-up.

**SKIN CONTACT.....:** Remove contaminated clothing immediately. Wash affected areas thoroughly with soap and water for at least 15 minutes. Tincture of green soap and water is also effective in removing isocyanates. Wash contaminated clothing thoroughly before reuse. For severe exposures, get under safety shower after removing clothing, then get medical attention. For lesser exposures, seek medical attention if irritation develops or persists after the area is washed.

**INHALATION.....:** Move to an area free from risk of further exposure. Administer oxygen or artificial respiration as needed. Obtain medical attention. Asthmatic-type symptoms may develop and may be immediate or delayed up to several hours. Consult physician.

**INGESTION.....:** Do not induce vomiting. Give 1 to 2 cups of milk or water to drink. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Consult physician.

**NOTE TO PHYSICIAN.....:** Eyes. Stain for evidence of corneal injury. If cornea is burned, instill antibiotic steroid preparation frequently. Workplace vapors have produced reversible corneal epithelial edema impairing vision. Skin. This compound is a known skin sensitizer. Treat symptomatically as for contact dermatitis or thermal burns. Ingestion. Treat symptomatically. There is no specific antidote. Inducing vomiting is contraindicated because of the irritating nature of the compound. Respiratory. This compound is a known pulmonary sensitizer. Treatment is essentially symptomatic. An individual having a skin or pulmonary sensitization reaction to this material should be removed from exposure to any isocyanate.

## VII. EMPLOYEE PROTECTION RECOMMENDATIONS

**EYE PROTECTION.....:** Liquid chemical goggles or full-face shield. Contact lenses should not be worn. If vapor exposure is causing irritation, use a full-face, air-supplied respirator.

**SKIN PROTECTION.....:** Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water. Cover as much of the exposed skin area as possible with appropriate clothing. If skin creams are used, keep the area covered only by the cream to a minimum.

**RESPIRATORY PROTECTION.....:** An approved positive pressure air-supplied respirator is required whenever TDI or MDI concentrations are not known or exceed the Short-Term Exposure or Ceiling Limit of 0.02 ppm or exceed the 8-hour Time Weighted Average TLV of 0.005 ppm. An approved air-supplied respirator with full facepiece must also be worn during spray application, even if exhaust ventilation is used. For emergency and other conditions where the exposure limits may be greatly exceeded, use an approved, positive pressure self-contained breathing apparatus. TDI and MDI have poor warning properties since the odor at which these isocyanates can be smelled is substantially higher than 0.02 ppm. Observe OSHA regulations for respirator use (29 CFR 1910.134).

## **VII. EMPLOYEE PROTECTION RECOMMENDATIONS (Continued)**

**VENTILATION.....:** Local exhaust should be used to maintain levels below the TLV whenever isocyanates are handled, processed, or spray-applied. At normal room temperatures (70°F) TDI levels quickly exceed the TLV unless properly ventilated. Standard reference sources regarding industrial ventilation (e.g., ACGIH Industrial Ventilation) should be consulted for guidance about adequate ventilation.

**MONITORING.....:** Isocyanate exposure levels must be monitored by accepted monitoring techniques to ensure that the TLV is not exceeded. (Contact Mobay for guidance). See Volume 1 (Chapter 17) and Volume 3 (Chapter 3) in Patty's Industrial Hygiene and Toxicology for sampling strategy.

**MEDICAL SURVEILLANCE.....:** Medical supervision of all employees who handle or come in contact with isocyanates are recommended. These should include preemployment and periodic medical examinations with respiratory function tests (FEV, FVC as a minimum). Persons with asthmatic-type conditions, chronic bronchitis, other chronic respiratory diseases or recurrent skin eczema or sensitization should be excluded from working with isocyanates. Once a person is diagnosed as sensitized to isocyanates, no further exposure can be permitted.

**OTHER.....:** Safety showers and eyewash stations should be available. Educate and train employees in safe use of product. Follow all label instructions.

## **VIII. REACTIVITY DATA**

**STABILITY.....:** Stable under normal conditions.

**POLYMERIZATION.....:** May occur if in contact with moisture or other materials which react with isocyanates. Self-reaction may occur at temperatures over 350°F (177°C) or at lower temperatures if sufficient time is involved. See Section IV.

### **INCOMPATIBILITY**

**(MATERIALS TO AVOID).....:** Water, amines, strong bases, alcohols. Will cause some corrosion to copper alloys and aluminum. Reacts with water to form heat, CO<sub>2</sub> and insoluble ureas.

### **HAZARDOUS DECOMPOSITION**

**PRODUCTS.....:** By high heat and fire: carbon monoxide, oxides of nitrogen, traces of HCN, TDI and MDI vapors, mist and aerosols.

## **IX. SPILL OR LEAK PROCEDURES**

**STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:** Evacuate and ventilate spill area; dike spill to prevent entry into water system; wear full protective equipment, including respiratory equipment during clean-up. (See Section VII).

**Major Spill:** Call Mobay at 412/923-1800. If transportation spill, call CHEMTREC 800/424-9300. If temporary control of isocyanate vapor is required, a blanket of protein foam (available at most fire departments) may be placed over the spill. Large quantities may be pumped into closed, but not sealed, container for disposal.

## **IX. SPILL OR LEAK PROCEDURES (Continued)**

**Minor Spill:** Absorb isocyanate with sawdust or other absorbent, shovel into suitable unsealed containers, transport to well-ventilated area (outside) and treat with neutralizing solution: mixture of water (80%) with non-ionic surfactant Tergitol TMN-10 (20%), or; water (90%), concentrated ammonia (3-8%) and detergent (2%). Add about 10 parts of neutralizer per part of isocyanate, with mixing. Allow to stand uncovered for 48 hours to let CO<sub>2</sub> escape.

**Clean-up:** Decontaminate floor with decontamination solution letting stand for at least 15 minutes.

**CERCLA (SUPERFUND) REPORTABLE QUANTITY:** 100 pounds for TDI. None reported for MDI.

**WASTE DISPOSAL METHOD.....:** Follow all federal, state or local regulations. TDI must be disposed of in a permitted incinerator or landfill. Incineration is the preferred method for liquids. Solids are usually incinerated or landfilled. Empty containers must be handled with care due to product residue. Decontaminate containers prior to disposal. Empty decontaminated containers should be crushed to prevent reuse. DO NOT HEAT OR CUT EMPTY CONTAINER WITH ELECTRIC OR GAS TORCH. (See Sections IV and VIII). Vapors and gases may be highly toxic.

**RCRA STATUS.....:** TDI is listed as a hazardous waste (No. U-223) under Title 40 Code of Federal Regulations, Section 261.33 (f). The residue from decontaminating a TDI spill is also classified as a hazardous waste under Section 261.3 (c)(2) or RCRA.

## **X. SPECIAL PRECAUTIONS & STORAGE DATA**

### **STORAGE TEMPERATURE**

(MIN./MAX.).....: 70°F (21°C)/90°F (32°C)

**AVERAGE SHELF LIFE.....:** 12 months

### **SPECIAL SENSITIVITY**

(HEAT, LIGHT, MOISTURE): If container is exposed to high heat, 375°F (177°C) it can be pressurized and possibly rupture. TDI and MDI react slowly with water to form polyureas and liberates CO<sub>2</sub> gas. This gas can cause sealed containers to expand and possibly rupture.

### **PRECAUTIONS TO BE TAKEN**

**IN HANDLING AND STORING.:** Store in tightly closed containers to prevent moisture contamination. Do not reseal if contamination is suspected. Prevent all contact. Do not breathe the vapors. Warning properties (irritation of the eyes, nose and throat or odor) are not adequate to prevent chronic overexposure from inhalation. This material can produce asthmatic sensitization upon either single inhalation exposure to a relatively high concentration or upon repeated inhalation exposures to lower concentrations. Exposure to vapors of heated TDI or MDI can be extremely dangerous. Employee education and training in safe handling of this product are required under the OSHA Hazard Communication Standard.

## XI. SHIPPING DATA

D.O.T. SHIPPING NAME.....: Poisonous Liquid NOS  
TECHNICAL SHIPPING NAME....: Toluene Diisocyanate-Diphenylmethane Diisocyanate Blend  
D.O.T. HAZARD CLASS.....: Poison B  
UN/NA NO.....: UN 2810  
PRODUCT RQ.....: 125 lbs.  
D.O.T. LABELS.....: Poison  
D.O.T. PLACARDS.....: Poison  
FRT. CLASS BULK.....: Chemicals, NOI (Toluene Diisocyanate)  
FRT. CLASS PKG.....: Chemicals, NOI (Toluene Diisocyanate), NMFC 60000  
PRODUCT LABEL.....: Mondur 531 Product Label

## XII. ANIMAL TOXICITY DATA

ACUTE TOXICITY.....: Toxicity data has not been established for the Blend. Data listed are for the individual TDI and MDI components.

ORAL, LD<sub>50</sub>.....: The LD<sub>50</sub> will be affected by the composition of the blend. For TDI, the LD<sub>50</sub> (rats and mice) ranges from 4130-6170 mg/kg. For MDI, the LD<sub>50</sub> (rats) is greater than 15,800 mg/kg.

DERMAL, LD<sub>50</sub>.....: Expected to be greater than 7900 mg/kg (rabbits).

INHALATION, LC<sub>50</sub>..(4-hr): TDI, being more volatile than MDI, presents a greater hazard. The LC<sub>50</sub> (rats) for TDI ranges from 16-50 ppm (approx. 114-356 mg/m<sup>3</sup>) while for aerosols of MDI it ranges from 370-490 mg/m<sup>3</sup>.

EYE EFFECTS.....: TDI is a severe eye irritant capable of inducing corneal opacity. By contrast, MDI is only slightly irritating.

SKIN EFFECTS.....: Moderate skin irritant; however, repeated or prolonged contact may culminate in severe skin irritation and/or corrosion.

SENSITIZATION.....: Both TDI and MDI are dermal sensitizers (guinea pig). One study on TDI in guinea pigs reported that repeated dermal contact induced pulmonary sensitization. Although not well defined in animal models, both TDI and MDI are known to be pulmonary sensitizers in humans. Furthermore, there is some evidence to suggest that cross-sensitization between the two diisocyanates can occur.

SUBCHRONIC/CHRONIC TOXICITY: Pulmonary irritation and inflammation of the upper respiratory tract are the primary ill-effects following extended or excessive exposures to aerosols or vapors of MDI (both polymeric and monomeric forms) and TDI. Common pathologic effects include emphysema, pulmonary edema, pneumonitis and rhinitis. For TDI, extended exposures to as low as 0.1 ppm (0.71 mg/m<sup>3</sup>) have induced pulmonary inflammation in rats. For MDI, these effects are seen starting around 4 mg/m<sup>3</sup>.

### **OTHER:**

CARCINOGENICITY.....: The NTP conducted carcinogenesis studies of a commercial grade TDI using rats and mice using rats and mice in which the test material was diluted in corn oil and administered by gavage. The investigators concluded that TDI was carcinogenic in male and female rats (fibrosarcomas, pancreatic adenomas, neoplastic liver nodules and mammary gland fibrosarcomas) and female mice (hemangiosarcomas and hepatocellular adenomas). However, chronic inhalation studies in which rats and mice were exposed to 0.05 and 0.15 ppm TDI (10-30 times recommended TLV, 8-hr level) induced no treatment-related tumorigenic effects. In these studies, both

### XII. ANIMAL TOXICITY DATA (Continued)

exposure levels produced extensive irritation to the nasal passages and upper respiratory system of the test animals indicating that suitable effective exposures were administered. The International Isocyanate Institute is sponsoring a lifetime inhalation study on polymeric MDI in rats. This study is currently underway.

**MUTAGENICITY.....:** Both TDI and monomeric MDI are positive in the Ames assay with activation. However, mammalian cell transformation assays on TDI using human lung cells and Syrian hamster kidney cells were negative, as were micronucleus tests using rats and mice. Monomeric MDI was also negative in a micronucleus test.

**AQUATIC TOXICITY.....:** (For TDI)

LC<sub>50</sub> - 96 hr (static): 165 mg/liter (Fathead minnow)

LC<sub>50</sub> - 96 hr (static): Greater than 508 mg/liter (Grass shrimp)

LC<sub>50</sub> - 96 hr (static): Greater than 500 mg/liter (Daphnia magna)

(For MDI)

LC<sub>50</sub> - 96 hr (static): Greater than 500 mg/liter for Daphnia magna, Limnea stagnalis, and Zebra fish (Brachydanio rerio) for both monomeric and polymeric forms.

### XIII. APPROVALS

**REASON FOR ISSUE.....:** Revising MSDS onto New Format

**APPROVED BY.....:** J. H. Chapman

**TITLE.....:** Manager, Product Safety - Polyurethane

Product Code: E-531

Page 8 of 8

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

☒ Yes ..... "Safe use instructions" ..... 1  
 No ..... 2

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the final state of the product.

CBI  
☐

Activity	Physical State				
	Solid	Slurry	Liquid	Liquified Gas	Gas
Manufacture	1	2	3	4	5
Import	1	2	3	4	5
Process	1	2	<input checked="" type="radio"/> 3	4	5
Store	1	2	<input checked="" type="radio"/> 3	4	5
Dispose	<input checked="" type="radio"/> 1	2	3	4	5
Transport	<input checked="" type="radio"/> 1	2	3	4	5

☐ Mark (X) this box if you attach a continuation sheet.



CORE - SAFE USE INSTRUCTIONS

SEE SPECIFIC MSDS FOR ADDITIONAL INFORMATION

ADHESIVES - SOLVENT-BASED POLYURETHANES, EPOXIES, SEALERS

PAGE 01

FID #:040788

Latest Revision Date: 01/01/86

Material Identity: E-531

ROUTES OF EXPOSURE	EFFECTS OF OVEREXPOSURE	EMERGENCY FIRST AID
HARMFUL BY INHALATION	CNS EFFECTS - HEADACHE, DIZZINESS, NAUSEA, UNCONSCIOUSNESS, DEATH	REMOVE TO FRESH AIR. CONTACT MEDICAL.
IRRITANT, EYE & SKIN	DRY OR CRACKED SKIN - RASH REDNESS AND/OR BURNING ITCHING	IMMEDIATELY FLUSH WITH WATER. CONTACT MEDICAL.
HARMFUL BY INGESTION	GASTROINTESTINAL DISTURBANCE	CONTACT MEDICAL.
MAY BE SENSITIZER	ALLERGIC RESPIRATORY OR SKIN REACTION. SHORTNESS OF BREATH.	CONTACT MEDICAL.
MAY BE FLAMMABLE	-	-
MAY BE HARMFUL BY SKIN ABSORPTION	-	-
-	POSSIBLE LIVER, KIDNEY EFFECTS	-

\* Individual materials may contain additional chemical Ingredients which have toxic properties and are listed in the NIOSH Registry of Toxic Effects of Chemical substances.

USE INSTRUCTIONS

DO NOT USE IN CONFINED AREAS WITHOUT FIRST CONSULTING CONFINED SPACE PROCEDURE. BREATHING VAPORS MAY BE HAZARDOUS. VENTILATION MAY BE REQUIRED, WHERE FEASIBLE, TO MAINTAIN CONCENTRATIONS BELOW APPLICABLE LIMITS (OSHA, GM EMPLOYE EXPOSURE GUIDELINES).  
 AVOID CONTACT WITH SKIN.  
 KEEP CONTAINER TIGHTLY CLOSED WHEN NOT IN USE OR EMPTY.  
 KEEP AWAY FROM HEAT, SPARKS, AND OPEN FLAMES.  
 NO SMOKING ALLOWED IN AREA OF USE.  
 WASH HANDS AFTER USE AND BEFORE EATING, DRINKING SMOKING OR APPLYING COSMETICS.

PERSONAL PROTECTIVE EQUIPMENT

SAFETY GLASSES OR GOGGLES IF POTENTIAL FOR SPLASHING EXISTS.  
 IMPERVIOUS GLOVES MAY BE NECESSARY. RECOMMENDED TYYPE:  
 RESPIRATOR: YES NO RECOMMENDED TYPE:

FIRE FIGHTING INSTRUCTIONS

EID #:040788

Latest Revision Date: 01/01/86

Material Identity: E-531

FIRE FIGHTING INSTRUCTIONS

-----  
- Continuation -

USE CLASS B OR C FIRE EXTINGUISHING AGENT.

USE WATER TO COOL EXPOSED CONTAINERS.

USE SELF-CONTAINED BREATHING APPARATUS.

SPILL AND LEAK INSTRUCTIONS

-----  
CONTAIN SPILL AND PREVENT ENTERING SEWER IF POSSIBLE. CONTACT SUPERVISOR.  
EVACUATION OF AREA MAY BE NECESSARY. NOTIFY PLANT SECURITY.

STORAGE INSTRUCTIONS

-----  
STORE AWAY FROM HEAT AND DIRECT SUNLIGHT.

STORE IN APPROVED MATERIAL STORAGE AREA.

COMBUSTIBLE AND FLAMMABLE MATERIALS MAY NOT BE STORED TOGETHER.

STORE AWAY FROM STRONG OXIDIZING AGENTS.

DISPOSAL INSTRUCTIONS

-----  
CHECK LOCAL POLICY.

OTHER COMMENTS

-----  
WHEN HEATED, MAY YIELD TOXIC FUMES.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles  $\geq 10$  microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI

☐

N/A Handled in Liquid State

Physical  
State

Manufacture

Import

Process

Store

Dispose

Transport

Dust

<1 micron

1 to <5 microns

5 to <10 microns

Powder

<1 micron

1 to <5 microns

5 to <10 microns

Fiber

<1 micron

1 to <5 microns

5 to <10 microns

Aerosol

<1 micron

1 to <5 microns

5 to <10 microns

☐ Mark (X) this box if you attach a continuation sheet.

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SECTION 5 ENVIRONMENTAL FATE

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PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

---

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis:

Absorption spectrum coefficient (peak) .... 871 (1/M cm) at 284 nm

Reaction quantum yield,  $\phi$  ..... No information at          nm

Direct photolysis rate constant,  $k_p$ , at ...  $1.2 \times 10^{-3}$  1/hr when NO<sub>2</sub> latitude  
photolysis rate is  
0.37/hr(2)

b. Oxidation constants at 25°C:

For  $^1O_2$  (singlet oxygen),  $k_{ox}$  ..... No information 1/M hr

For  $RO_2$  (peroxy radical),  $k_{ox}$  ..... No information 1/M hr

c. Five-day biochemical oxygen demand,  $BOD_5$  ... Not applicable due to mg/l  
reaction with water

d. Biotransformation rate constant:

For bacterial transformation in water,  $k_b$  ... No oxygen consumed 1/hr

Specify culture ..... in modified MITI test (3)

e. Hydrolysis rate constants:

For base-promoted process,  $k_B$  ..... No information 1/M hr

For acid-promoted process,  $k_A$  ..... No information 1/M hr

For neutral process,  $k_N$  ..... No information 1/hr

f. Chemical reduction rate (specify conditions) Not expected

g. Other (such as spontaneous degradation) ... Polyurea formation under  
hydrolytic conditions. (4)

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☐ Mark (X) this box if you attach a continuation sheet.

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PART B PARTITION COEFFICIENTS

5.02 a. Specify the half-life of the listed substance in the following media.

<u>Media</u>	<u>Half-life (specify units)</u>
Groundwater	1 day in water solution (4)
Atmosphere	26 hr (2)
Surface water	1 day in water solution (4)
Soil	1 day (4)

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

<u>CAS No.</u>	<u>Name</u>	<u>Half-life (specify units)</u>	<u>Media</u>
Net found	Polyurea	1 yr	in water and soil (4)
95-80-7	2,4-Toluene diamine	1 day	in biological waste-water treatment
823-40-5	2,6-Toluene diamine	1 day	in plant (4)
5206-52-0	Urea, NNNN'-bis(3-isocyanato-4-methylphenyl)	Unknown half-life	(5,6)

5.03 Specify the octanol-water partition coefficient,  $K_{ow}$  ... reacts with both at 25°C  
Method of calculation or determination ..... octanol and water

5.04 Specify the soil-water partition coefficient,  $K_d$  ..... reacts with at 25°C  
Soil type ..... water

5.05 Specify the organic carbon-water partition coefficient,  $K_{oc}$  ..... reacts with water at 25°C

5.06 Specify the Henry's Law Constant,  $H$  ..... reacts with water atm-m<sup>3</sup>/mole

☐ Mark (X) this box if you attach a continuation sheet.

- 5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

<u>Bioconcentration Factor</u>	<u>Species</u>	<u>Test</u> <sup>1</sup>
None detected	Moina macrocopa Straus	Not defined (4)
None detected	Cyprinus carpio	Not defined (4)

<sup>1</sup>Use the following codes to designate the type of test:

F = Flowthrough  
S = Static

- (1) Phillips and Nachod, eds., Organic Electronic Spectral Data, Vol IV, pg. 200.
- (2) K.H. Becker, V. Bastian and Th. Klein, The reactions of toluediisocyanate, toluediamine and methylenedianiline under simulated atmospheric conditions, J. Photochem, and Photobiol., A: Chemistry, 45 (1988) 195-205.
- (3) N. Caspers, B. Hamburger, R. Kanne and Waklebert, Ecotoxicity of TDI, MDI, TDA and MDA, Report to the International Isocyanate Institute, E-CE-41, 1986. Quoted in D.S. Gilbert, Fate of TDI and MDI in Air, Soil and Water, Polyurethanes World Congress 1987, Proceedings of the SPI/FSK.
- (4) F.K. Brochhagen and B.M. Grieveson, Environmental aspects of isocyanates in water and soil, Cellular Polymers, 3 (1984) 11-17.
- (5) K. Marcali, Microdetermination of toluediisocyanate in atmosphere, Anal. Chem. 29 (1957) 552-558.
- (6) G.A. Campbell, T.J. Dearlove and W.C. Meluch, Diisocyanatotolyl urea, U.S. Patent 3,906,019 (1975), Chem. Abs. 84:5645h.

☐ Mark (X) this box if you attach a continuation sheet.

\*Response not required for TD1

6.04 For each market listed below, state the quantity sold and the total sales value of CBI the listed substance sold or transferred in bulk during the reporting year.

☐

<u>Market</u>	<u>Quantity Sold or Transferred (kg/yr)</u>	<u>Total Sales Value (\$/yr)</u>
Retail sales	_____	_____
Distribution -- Wholesalers	_____	_____
Distribution -- Retailers	_____	_____
Intra-company transfer	_____	_____
Repackagers	_____	_____
Mixture producers	_____	_____
Article producers	_____	_____
Other chemical manufacturers or processors	_____	_____
Exporters	_____	_____
Other (specify)	_____	_____
_____	_____	_____

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist for the listed substance and state the cost of each substitute. A commercially feasible substitute is one which is economically and technologically feasible to use in your current operation, and which results in a final product with comparable performance in its end uses.

CBI

☐

<u>Substitute</u>	<u>Cost (\$/kg)</u>
Unknown	_____
_____	_____
_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

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SECTION 7 MANUFACTURING AND PROCESSING INFORMATION

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General Instructions:

For questions 7.04-7.06, provide a separate response for each process block flow diagram provided in questions 7.01, 7.02, and 7.03. Identify the process type from which the information is extracted.

---

PART A MANUFACTURING AND PROCESSING PROCESS TYPE DESCRIPTION

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7.01 In accordance with the instructions, provide a process block flow diagram showing the major (greatest volume) process type involving the listed substance.

CBI

☐ Process type ..... Polyurethane foam manufacturing process

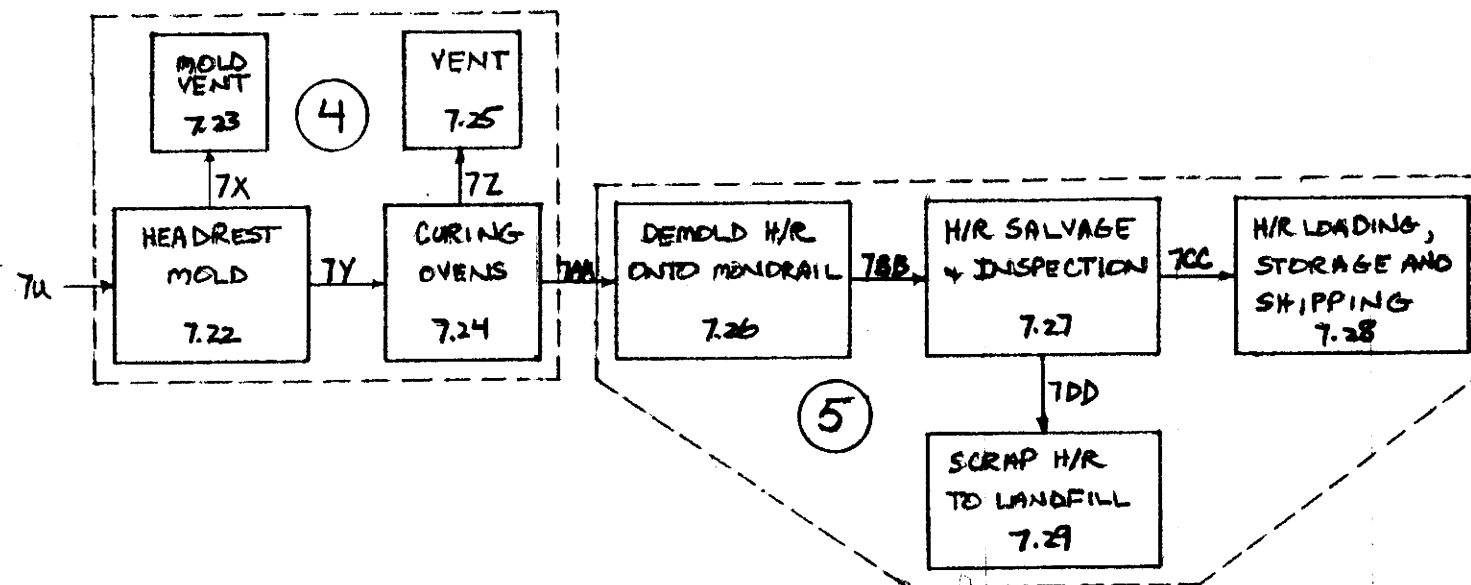
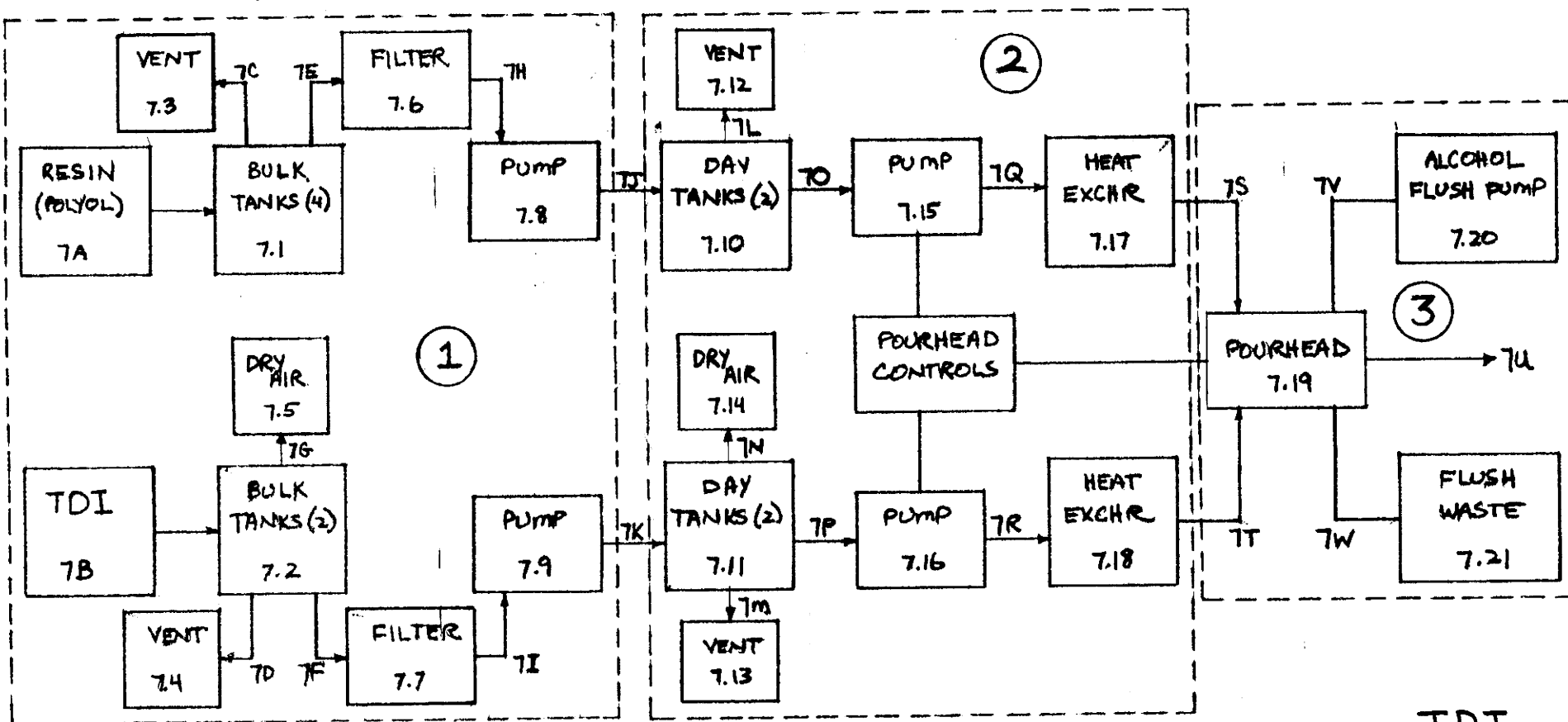
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☐ Mark (X) this box if you attach a continuation sheet.

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## TDI EMISSIONS

- 7.4, 7.13 PRESSURE RELIEF VENTING
- 7.9, 7.16 TDI PUMP SEALS
- 7.19 POURHEAD SEALS
- 7.23, 7.25 REACTION ZONE / CURING OVEN VENTING
- 7.26-7.28 POST CURE

---

7.03 In accordance with the instructions, provide a process block flow diagram showing all process emission streams and emission points that contain the listed substance and which, if combined, would total at least 90 percent of all facility emissions if not treated before emission into the environment. If all such emissions are released from one process type, provide a process block flow diagram using the instructions for question 7.01. If all such emissions are released from more than one process type, provide a process block flow diagram showing each process type as a separate block.

CBI

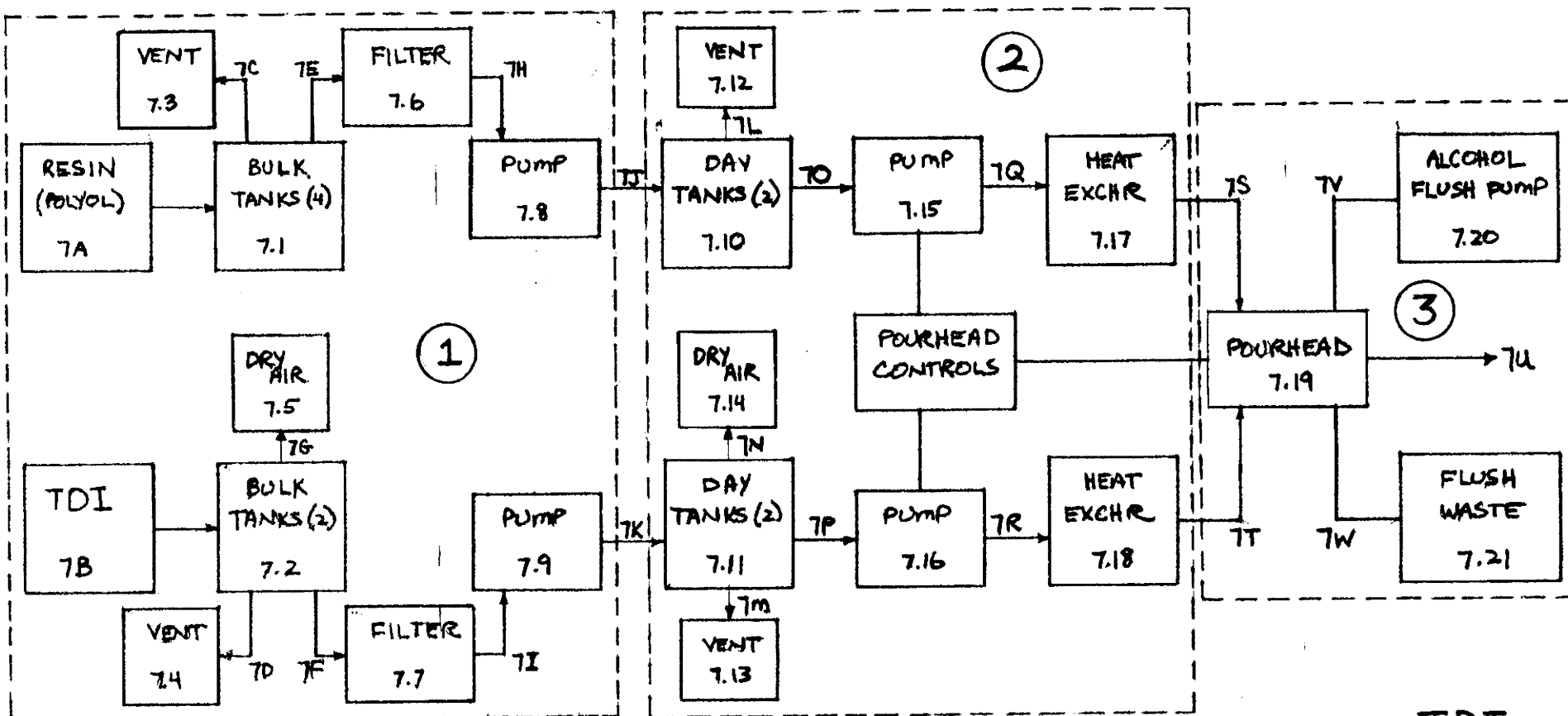
☐ Process type ..... POLYURETHANE FOAM MFG.

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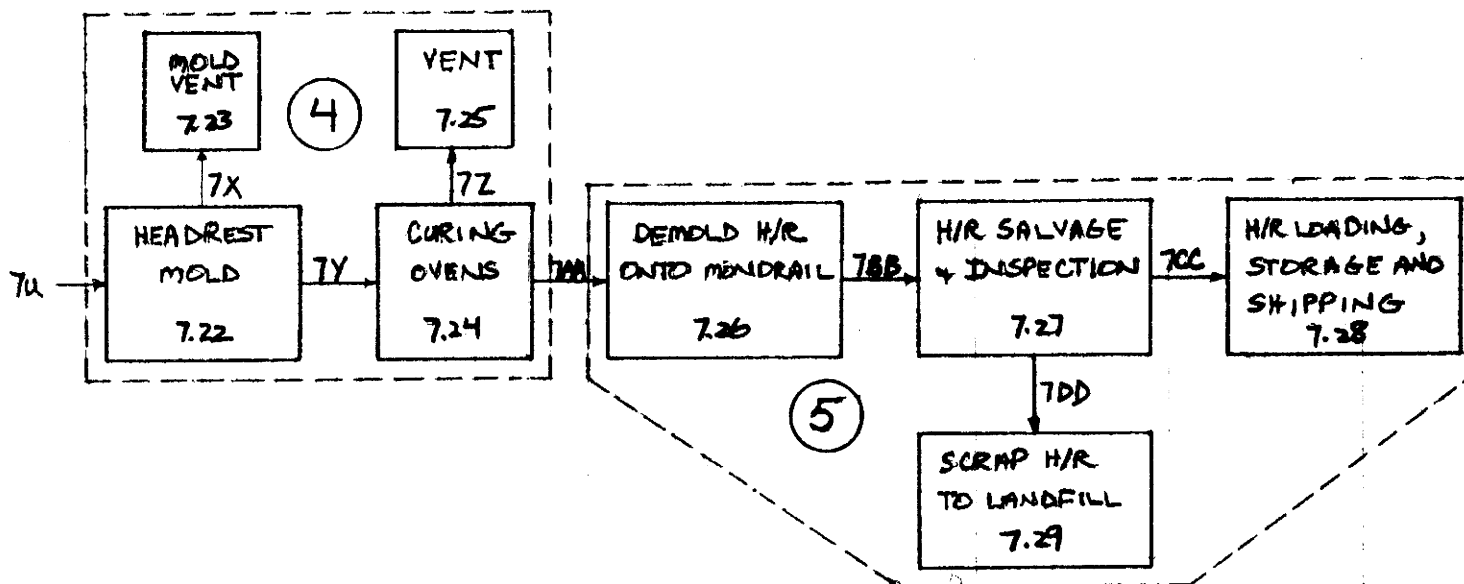
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☐ Mark (X) this box if you attach a continuation sheet.

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## TDI EMISSIONS



7.4, 7.13 PRESSURE RELIEF VENTING

7.9, 7.16 TDI PUMP SEALS

7.19 POURHEAD SEALS

7.23, 7.25 REACTION ZONE / CURING  
OVEN VENTING

7.26-7.28 POST CURE

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Polyurethane foam manufacturing process

<u>Unit Operation ID Number</u>	<u>Typical Equipment Type</u>	<u>Operating Temperature Range (°C)</u>	<u>Operating Pressure Range (mm Hg)</u>	<u>Vessel Composition</u>
<u>7.1,7.2</u>	<u>BULK TANK, 304 ST.STL.</u>	<u>25</u>	<u>1290</u>	<u>PHENOLICLINED</u>
<u>7.8</u>	<u>GEAR PUMP</u>	<u>25</u>	<u>3100</u>	<u>STEEL</u>
<u>7.9</u>	<u>CANNED MOTOR PUMP</u>	<u>25</u>	<u>2330</u>	<u>STEEL</u>
<u>7.6</u>	<u>CUND MICRO WYND FILTER</u>	<u>25</u>	<u>3100</u>	<u>STEEL</u>
<u>7.7</u>	<u>CUND MICRO WYND FILTER</u>	<u>25</u>	<u>2330</u>	<u>CLOTH</u>
<u>7.10</u>	<u>200 GAL. DAY TANKS</u>	<u>25</u>	<u>1550</u>	<u>STEEL</u>
<u>7.11</u>	<u>200 GAL. DAY TANK</u>	<u>25</u>	<u>1030</u>	<u>STEEL</u>
<u>7.5,7.14</u>	<u>PALL AIR DRYER</u>	<u>25</u>	<u>4100</u>	<u>STEEL</u>
<u>7.15</u>	<u>ZENITH GEAR PUMP</u>	<u>25</u>	<u>10,350</u>	<u>STEEL</u>
<u>7.16</u>	<u>ZENITH GEAR PUMP</u>	<u>25</u>	<u>1030</u>	<u>STEEL</u>
<u>7.17</u>	<u>SHELL &amp; TUBE HT. EX.</u>	<u>25</u>	<u>10,350</u>	<u>STEEL</u>
<u>7.18</u>	<u>SHELL &amp; TUBE HT. EX.</u>	<u>25</u>	<u>1030</u>	<u>STEEL</u>
<u>7.19</u>	<u>MARTIN SWEETS POUR HEAD</u>	<u>25</u>	<u>1030</u>	<u>STEEL</u>
<u>7.22</u>	<u>HEADREST MOLD</u>	<u>65</u>	<u>760</u>	<u>ALUMINUM</u>
<u>7.24</u>	<u>CURING OVENS</u>	<u>120</u>	<u>760</u>	<u>STEEL</u>
<u>7.20</u>	<u>GRACO AIR PUMP</u>	<u>25</u>	<u>1500</u>	<u>STEEL</u>
<u>7.3,4,12,13.</u>	<u>RELIEF VALVE</u>	<u>25</u>	<u>1500</u>	<u>STEEL</u>

☐ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Polyurethane foam manufacturing process

Process Stream ID Code	Process Stream Description	Physical State <sup>1</sup>	Stream Flow (kg/yr)
7A	RESIN FROM TANK TRUCK	OL	630,000
7B	TDI FROM TANK TRUCK	OL	255,000
7C,D,L,M,	PRESSURE RELIEF VENTING	GU	UNKNOWN
7X,Z	GENERAL VENTILATION	GU	UNKNOWN
7G,N	DRY AIR BLANKET	GU	UNKNOWN
7F,I,K,P,R,T.	TDI	OL	255,000
7E,H,J,O,Q,S.	POLYOL	OL	620,000
7U,Y,AA,BB,CC,DD.	POLYURETHANE FOAM	SO	875,000
7V	ALCOHOL FLUSH	OL	7900
7W	FLUSH WASTE	OL	8700

<sup>1</sup>Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)  
 GU = Gas (uncondensable at ambient temperature and pressure)  
 SO = Solid  
 SY = Sludge or slurry  
 AL = Aqueous liquid  
 OL = Organic liquid  
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☐ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type ..... POLYURETHANE FOAM MFG.

a.	b.	c.	d.	e.
Process Stream ID Code	Known Compounds <sup>1</sup>	Concentrations <sup>2,3</sup> (% or ppm)	Other Expected Compounds	Estimated Concentrations (% or ppm)
7A,E,H, J,O,Q,S.	POLYOL	100% (A)(W)	NA	NA
7B,F,I, K,P,R,T	TDI	70-80% (MFG MSDA)	NA	NA
	MDI	5-15% (MFG MSDA)	NA	NA
7C,L,X,Z.	AIR	100%(E)(V)	NA	NA
7G,N.	DRY AIR	100%(E)(V)	NA	NA

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type ..... POLYURETHANE FOAM MFG.

a.	b.	c.	d.	e.
Process Stream ID Code	Known Compounds <sup>1</sup>	Concentrations <sup>2,3</sup> (% or ppm)	Other Expected Compounds	Estimated Concentrations (% or ppm)
7D,M.	DRY AIR	99.9%(E)(V)	NA	NA
	TDI	0.1%(E)(V)	NA	NA
7W	TECSOL 3	90%(E)(W)	NA	NA
	TDI	5%(E)(W)	NA	NA
	POLYOL	5%(E)(W)	NA	NA
7V	TECSOL 3	100%(E)(W)	NA	NA
7U,Y,AA, BB,CC,DD.	POLYURETHANE FOAM	100%(E)(W)	NA	NA

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.

7.06 (continued)

<sup>1</sup>For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

<u>Additive Package Number</u>	<u>Components of Additive Package</u>	<u>Concentrations (% or ppm)</u>
<u>1</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>2</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>3</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>4</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>5</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>

<sup>2</sup>Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

<sup>3</sup>Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

☐ Mark (X) this box if you attach a continuation sheet.



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PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

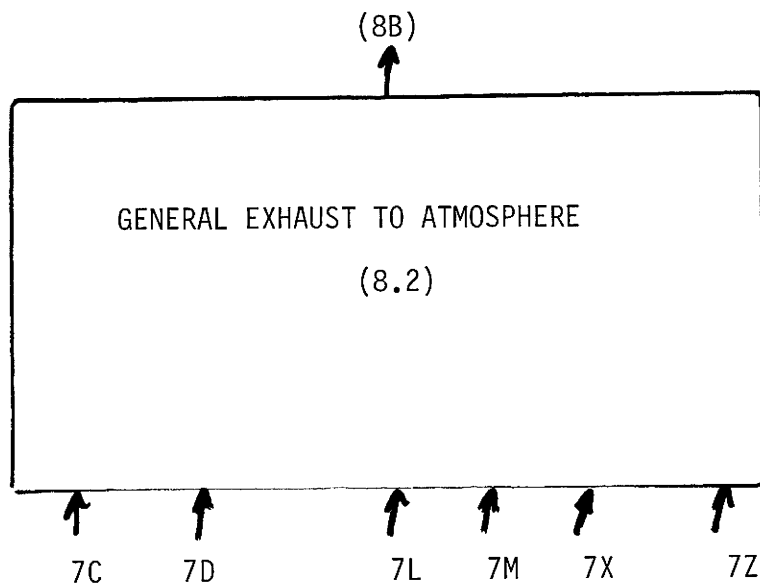
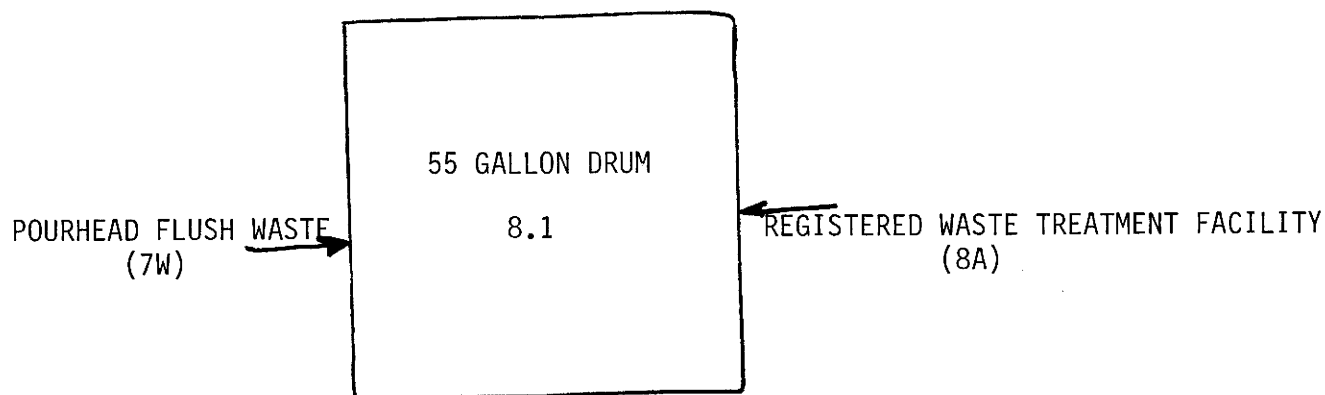
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8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.01.

CBI

☐ Process type ..... POLYURETHANE FOAM MFG.

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☐ Mark (X) this box if you attach a continuation sheet.

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# PART B RESIDUAL GENERATION AND CHARACTERIZATION

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

☐ Process type ..... POLYURETHANE FOAM MFG.

a.	b.	c.	d.	e.	f.	g.
Stream ID Code	Type of Hazardous Waste <sup>1</sup>	Physical State of Residual <sup>2</sup>	Known Compounds <sup>3</sup>	Concentrations (% or ppm) <sup>4,5,6</sup>	Other Expected Compounds	Estimated Concentrations (% or ppm)
7W	I	OL	TECSOL3	90% (E)(W)		
		OL	POLYOL	5% (E)(W)		
		OL	TDI	5% (E)(W)		
7C,L,X,Z.		GU	AIR	100% (E)(V)		
7D,M.		GU	DRY AIR	99.9% (E)(V)		
			TDI	0.1% (E)(V)		

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

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8.05 (continued)

<sup>1</sup>Use the following codes to designate the type of hazardous waste:

I = Ignitable  
C = Corrosive  
R = Reactive  
E = EP toxic  
T = Toxic  
H = Acutely hazardous

<sup>2</sup>Use the following codes to designate the physical state of the residual:

GC = Gas (condensable at ambient temperature and pressure)  
GU = Gas (uncondensable at ambient temperature and pressure)  
SO = Solid  
SY = Sludge or slurry  
AL = Aqueous liquid  
OL = Organic liquid  
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

-----  
8.05 continued below

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☐ Mark (X) this box if you attach a continuation sheet.

---

---

8.05 (continued)

<sup>3</sup>For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

<u>Additive Package Number</u>	<u>Components of Additive Package</u>	<u>Concentrations (% or ppm)</u>
<u>1</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>2</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>3</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>4</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>5</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>

<sup>4</sup>Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

---

8.05 continued below

---

☐ Mark (X) this box if you attach a continuation sheet.

---

---

8.05 (continued)

<sup>5</sup>Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

<sup>6</sup>Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

<u>Code</u>	<u>Method</u>	<u>Detection Limit</u> <u>(± ug/l)</u>
<u>1</u>	_____	_____
<u>2</u>	_____	_____
<u>3</u>	_____	_____
<u>4</u>	_____	_____
<u>5</u>	_____	_____
<u>6</u>	_____	_____

---

☐ Mark (X) this box if you attach a continuation sheet.

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CBI

[illegible]

<sup>2</sup>Use the codes provided in Exhibit 8-2 to designate the management methods

58

\*Response not required for TD1

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

Incinerator	Combustion Chamber Temperature (°C)		Location of Temperature Monitor		Residence Time In Combustion Chamber (seconds)	
	Primary	Secondary	Primary	Secondary	Primary	Secondary
1						
2						
3						

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes ..... 1

No ..... 2

\*Does not apply

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

Incinerator	Air Pollution Control Device <sup>1</sup>	Types of Emissions Data Available
1		
2		
3		

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes ..... 1

No ..... 2

<sup>1</sup>Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)

E = Electrostatic precipitator

O = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records on the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

CBI

☐

Data Element	Data are Maintained for:		Year in Which Data Collection Began	Number of Years Records Are Maintained
	Hourly Workers	Salaried Workers		
Date of hire	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Age at hire	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Work history of individual before employment at your facility	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Sex	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Race	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Job titles	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Start date for each job title	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
End date for each job title	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Work area industrial hygiene monitoring data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1988	Permanent
Personal employee monitoring data	<input checked="" type="checkbox"/>		1987	Permanent
Employee medical history	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Employee smoking history				
Accident history	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Retirement date	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Termination date	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Vital status of retirees	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent
Cause of death data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1956	Permanent

☐ Mark (X) this box if you attach a continuation sheet.



9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

a.	b.	c.	d.	e.
<u>Activity</u>	<u>Process Category</u>	<u>Yearly Quantity (kg)</u>	<u>Total Workers</u>	<u>Total Worker-Hours</u>
Manufacture of the listed substance	Enclosed	_____	_____	_____
	Controlled Release	_____	_____	_____
	Open	_____	_____	_____
On-site use as reactant	Enclosed	_____	_____	_____
	Controlled Release	255,000	65	125,000
	Open	_____	_____	_____
On-site use as nonreactant	Enclosed	_____	_____	_____
	Controlled Release	_____	_____	_____
	Open	_____	_____	_____
On-site preparation of products	Enclosed	_____	_____	_____
	Controlled Release	_____	_____	_____
	Open	_____	_____	_____

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A

Millwright

B

Pipefitter

C

Production Line Workers

D

Electrician

E

Machine Cleaner

F

Janitor

G

Supervisor

H

I

J

☐ Mark (X) this box if you attach a continuation sheet.

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9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

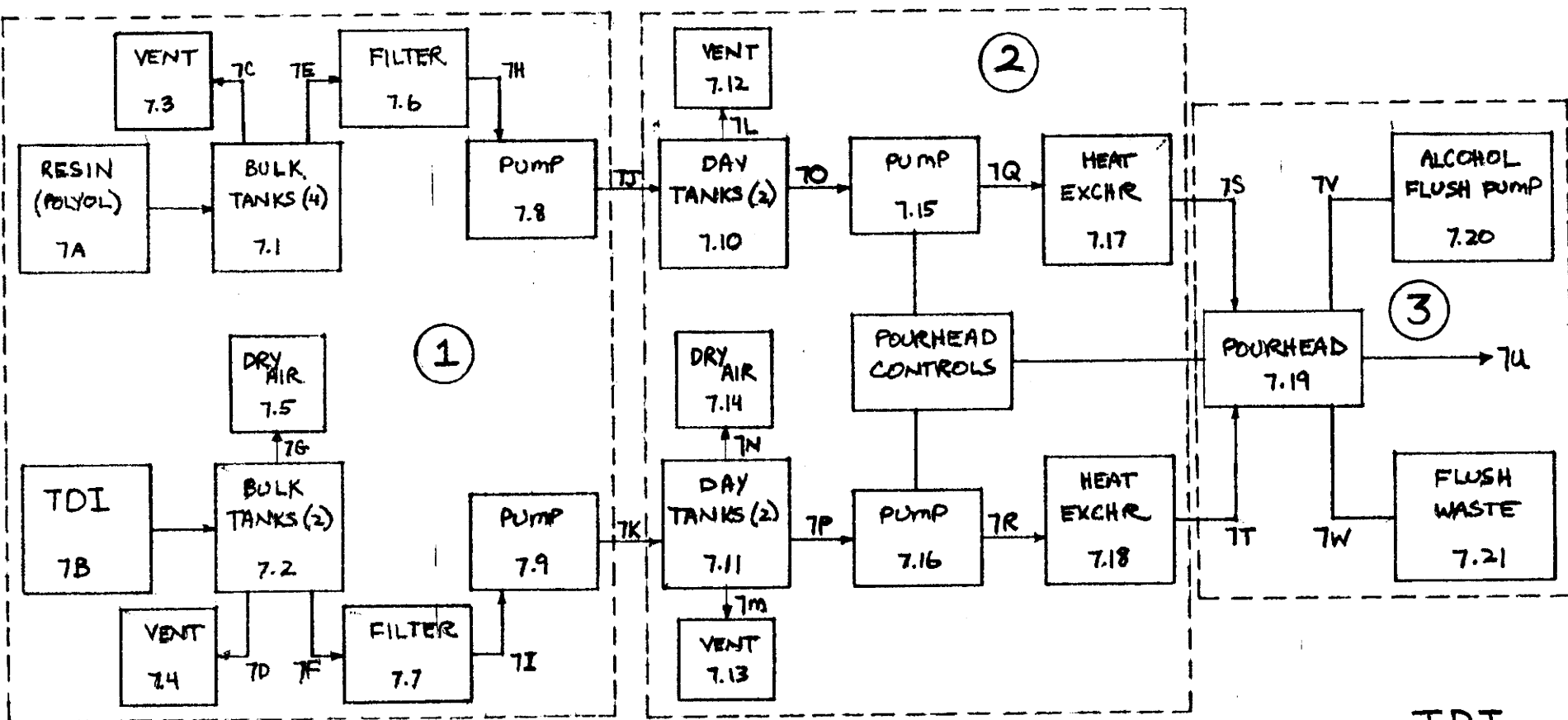
CBI

☐ Process type ..... POLYURETHANE FOAM MFG.

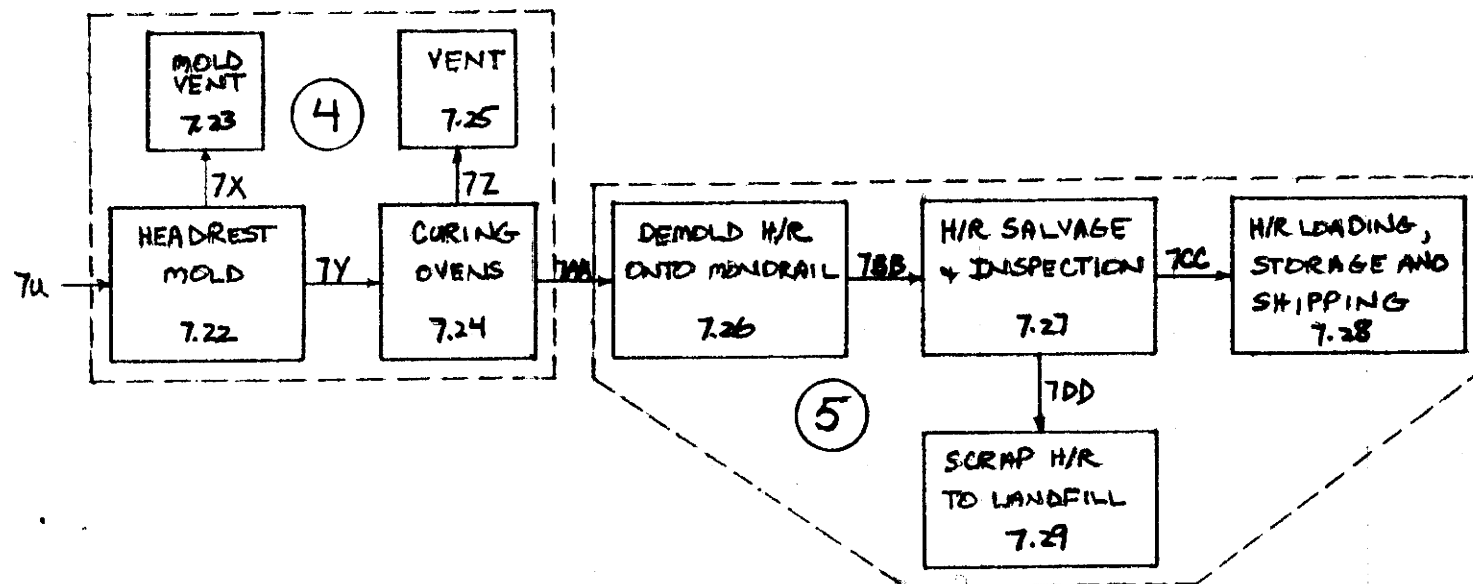
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☐ Mark (X) this box if you attach a continuation sheet.

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## TDI EMISSIONS



7.4, 7.13 PRESSURE RELIEF VENTING

7.9, 7.16 TDI PUMP SEALS

7.19 POURHEAD SEALS

7.23, 7.25 REACTION ZONE / CURING  
OVEN VENTING

7.26-7.28 POST CURE

9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. Add any additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... POLYURETHANE FOAM MFG.

Work Area ID

Description of Work Areas and Worker Activities

1. PIPEFITTER AND TRUCK DRIVER UNLOAD TANK TRUCK, PIPEFITTER CHANGES FILTERS 1/yr.
2. GENERAL AREA CONTAINING SUPPORT EQUIPMENT TO POURHEAD. THRU AISLE WAY GOES THROUGH THIS AREA.
3. PIPEFITTERS SERVICE POURHEAD IN THIS ENCLOSE BOOTH WITH LOCAL EXHAUST.
4. OVEN CURING AREA. UNDER S.O.P. THIS AREA IS CLOSED TO ALL PERSONNEL.
5. THIS ENCOMPASSES ALL PRODUCTION AREAS THAT HANDLE THE URETHANE FOAM.

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

☐ CBI Process type ..... POLYURETHANE FOAM MFG.

Work area .....

WORK AREA	Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance <sup>1</sup>	Average Length of Exposure Per Day <sup>2</sup>	Number of Days per Year Exposed
1.	B	1	INHALATION	GU	C	32
2.	A,B,D,E,F,G.	6	INHALATION	GU	E	240
3.	B	2	INHALATION	GU	C	240
	E,F.	1	INHALATION	GU	A	240
4.	NONE	0	NA	NA	NA	NA
5.	A-G	65	INHALATION	GU	E	240

<sup>1</sup>Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)  
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)  
 SO = Solid

SY = Sludge or slurry  
 AL = Aqueous liquid  
 OL = Organic liquid  
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

<sup>2</sup>Use the following codes to designate average length of exposure per day:

A = 15 minutes or less  
 B = Greater than 15 minutes, but not exceeding 1 hour  
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours  
 E = Greater than 4 hours, but not exceeding 8 hours  
 F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Polyurethane Foam Manufacturing Process

Work area .....

AREA	Labor Category	8-hour TWA Exposure Level (ppm, mg/m <sup>3</sup> , other-specify)	15-Minute Peak Exposure Level (ppm, mg/m <sup>3</sup> , other-specify)
1.	B	0	0
2.	A,B,D,F,G.	0	0
3.	B,F.	0	0.05 PPM
4.	NONE	0	0
%.	A-G	0	0

☐ Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

☐

<u>Sample/Test</u>	<u>Work Area ID</u>	<u>Testing Frequency (per year)</u>	<u>Number of Samples (per test)</u>	<u>Who Samples<sup>1</sup></u>	<u>Analyzed In-House (Y/N)</u>	<u>Number of Years Records Maintained</u>
Personal breathing zone						
General work area (air)	1,2,3,5.	10	50	d	Y	I
Wipe samples						
Adhesive patches						
Blood samples						
Urine samples						
Respiratory samples	1,2,3,5.	1	3	PLANT HOSPITAL	Y	PERMANENT
Allergy tests						
Other (specify)						
Other (specify)						
Other (specify)						

<sup>1</sup>Use the following codes to designate who takes the monitoring samples:

- A = Plant industrial hygienist
- B = Insurance carrier
- C = OSHA consultant
- D = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.



9.09 For each sample type identified in question 9.08, describe the type of sampling and analytical methodology used for each type of sample.

<input type="checkbox"/> Sample Type	Sampling and Analytical Methodology
GENERAL WORK AREA (AIR SAMPLE)	"MDA" CHEMCASSETTE - DRY COLORIMETRIC
BREATHING TEST	PULMONARY FUNCTION

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

CBI

<input type="checkbox"/> Equipment Type <sup>1</sup>	Detection Limit <sup>2</sup>	Manufacturer	Averaging Time (hr)	Model Number
D(E)	0.001A	MDA SCIENTIFIC	CONTINUOUS	SERIES 7100

<sup>1</sup>Use the following codes to designate personal air monitoring equipment types:

- A = Passive dosimeter
- B = Detector tube
- C = Charcoal filtration tube with pump
- D = Other (specify) DRY COLORIMETRIC

Use the following codes to designate ambient air monitoring equipment types:

- E = Stationary monitors located within work area
- F = Stationary monitors located within facility
- G = Stationary monitors located at plant boundary
- H = Mobile monitoring equipment (specify) \_\_\_\_\_
- I = Other (specify) \_\_\_\_\_

<sup>2</sup>Use the following codes to designate detection limit units:

- A = ppm
- B = Fibers/cubic centimeter (f/cc)
- C = Micrograms/cubic meter ( $\mu/m^3$ )

☐ Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

☐

Test Description

Frequency  
(weekly, monthly, yearly, etc.)

Pulmonary Function

yearly

☐ Mark (X) this box if you attach a continuation sheet.

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

[ ] Process type ..... Polyurethane Foam Manufacturing Process

Work area ..... Headrest Dept. 1-5

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	<u>Y</u>	<u>1968</u>	<u>n</u>	
General dilution	<u>Y</u>	<u>1968</u>	<u>n</u>	
Other (specify)				
Vessel emission controls				
Mechanical loading or packaging equipment				
Other (specify)				

98

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... POLYURETHANE FOAM MFG.

Work area ..... 1-5

Equipment or Process Modification	Reduction in Worker Exposure Per Year (%)
NONE	

☐ Mark (X) this box if you attach a continuation sheet.

---

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

---

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... POLYURETHANE FOAM MFG.

Work area .....

	AREAS 1-3	AREAS 4-5
	Wear or	
	Use	
<u>Equipment Types</u>	<u>(Y/N)</u>	
Respirators	N	N
Safety goggles/glasses	Y	Y
Face shields	N	N
Coveralls	Y	SOME
Bib aprons	N	N
Chemical-resistant gloves	Y	N
Other (specify)		
_____	_____	
_____	_____	

---

☐ Mark (X) this box if you attach a continuation sheet.

---

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... N/A

Work Area	Respirator Type	Average Usage <sup>1</sup>	Fit Tested (Y/N)	Type of Fit Test <sup>2</sup>	Frequency of Fit Tests (per year)
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

<sup>1</sup>Use the following codes to designate average usage:

A = Daily  
 B = Weekly  
 C = Monthly  
 D = Once a year  
 E = Other (specify) \_\_\_\_\_

<sup>2</sup>Use the following codes to designate the type of fit test:

QL = Qualitative  
 QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.

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**PART E WORK PRACTICES**

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- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type ..... POLYURETHANE FOAM MFG.

Work area .....

AREA 1. AUTH. PERS. ONLY, WARNING SIGNS, SAFE USE INST., GENERAL EXHAUST

AREA 2. GENERAL MONITORING, WARNING SIGNS, SAFE USE INST., GENERAL EXHAUST.

AREA 3. AUTH PERS, ONLY, WARNINGS SIGNS, LOCAL EXHAUST

AREA 4. CONFINED SPACE-RESTRICTED ENTRANCE, WARNING SIGNS

AREA 5. GENERAL MONITORING, SAFE USE INST., GENERAL EXHAUST.

---

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type ..... POLYURETHANE FOAM MFG.

Work area .....

<u>Housekeeping Tasks</u>	<u>Less Than Once Per Day</u>	<u>1-2 Times Per Day</u>	<u>3-4 Times Per Day</u>	<u>More Than 4 Times Per Day</u>
Sweeping	X			
Vacuuming	X			
Water flushing of floors	X			
Other (specify)				
NEUTRALIZING	X			

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☐ Mark (X) this box if you attach a continuation sheet.

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\*Response not required for TD1

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure

Yes ..... 1

No ..... 2

Emergency exposure

Yes ..... 1

No ..... 2

If yes, where are copies of the plan maintained?

Routine exposure: \_\_\_\_\_

Emergency exposure: \_\_\_\_\_

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

☒ Yes ..... 1

No ..... 2

If yes, where are copies of the plan maintained? Plant Security

Has this plan been coordinated with state or local government response organizations? Circle the appropriate response.

☒ Yes ..... 1

No ..... 2

\*Response not required for TD1

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

☒ Plant safety specialist ..... 1

Insurance carrier ..... 2

OSHA consultant ..... 3

Other (specify) \_\_\_\_\_ ..... 4

☐ Mark (X) this box if you attach a continuation sheet.



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SECTION 10 ENVIRONMENTAL RELEASE

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General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

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PART A GENERAL INFORMATION

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10.01 Where is your facility located? Circle all appropriate responses.

CBI

- ☐ Industrial area ..... ①
- Urban area ..... 2
- Residential area ..... ③
- Agricultural area ..... ④
- Rural area ..... 5
- Adjacent to a park or a recreational area ..... 6
- Within 1 mile of a navigable waterway ..... 7
- Within 1 mile of a school, university, hospital, or nursing home facility ..... ⑧
- Within 1 mile of a non-navigable waterway ..... 9
- Other (specify) \_\_\_\_\_ ..... 10
- 

☐ Mark (X) this box if you attach a continuation sheet.

---

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude ..... 40 ° 34 , 23 "

Longitude ..... 85 ° 41 , 14 "

UTM coordinates ..... Zone \_\_\_\_\_, Northing \_\_\_\_\_, Easting \_\_\_\_\_

\*Response not required for TD1

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitation ..... inches/year

Predominant wind direction .....

\*Response not required for TD1

10.04 Indicate the depth to groundwater below your facility.

Depth to groundwater ..... meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of CBI Y, N, and NA.)

On-Site Activity	Environmental Release		
	Air	Water	Land
Manufacturing	N/A	N/A	N/A
Importing	N/A	N/A	N/A
Processing	Y	N	N
Otherwise used	N/A	N/A	N/A
Product or residual storage	Y	N	N
Disposal	N/A	N/A	N/A
Transport	N/A	N/A	N/A

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐

Quantity discharged to the air .....	1-246	kg/yr ±	__ %
Quantity discharged in wastewaters .....	0	kg/yr ±	__ %
Quantity managed as other waste in on-site treatment, storage, or disposal units .....	0	kg/yr ±	__ %
Quantity managed as other waste in off-site treatment, storage, or disposal units .....		kg/yr ±	__ %

This chemical is used in a closed system. Therefore, no release is anticipated.

This small release is due to the above ground storage tank. The tank is covered with a blanket of compressed air. However, a small release is not unreasonable.

☐ Mark (X) this box if you attach a continuation sheet.

10.08 Describe the control technologies used to minimize release of the listed substance for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Polyurethane Foam Manufacturing Process

<u>Stream ID Code</u>	<u>Control Technology</u>	<u>Percent Efficiency</u>
	Not Used	

☐ Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

- 10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

Process type ..... POLYURETHANE FOAM MFG.

Point Source  
ID Code

Description of Emission Point Source

NONE

NA

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

10.10 Emission Characteristics -- Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

Point Source ID Code	Physical State <sup>1</sup>	Average Emissions (kg/day)	Frequency <sup>2</sup> (days/yr)	Duration <sup>3</sup> (min/day)	Average Emission Factor <sup>4</sup>	Maximum Emission Rate (kg/min)	Maximum Emission Rate Frequency (events/yr)	Maximum Emission Rate Duration (min/event)
	V		1-246					

<sup>1</sup>Use the following codes to designate physical state at the point of release:

G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) \_\_\_\_\_

<sup>2</sup>Frequency of emission at any level of emission

<sup>3</sup>Duration of emission at any level of emission

<sup>4</sup>Average Emission Factor -- Provide estimated ( $\pm$  25 percent) emission factor (kg of emission per kg of production of listed substance)

10.11 Stack Parameters -- Identify the stack parameters for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

\*Unknown

☐

Point Source ID Code	Stack Height(m)	Stack Inner Diameter (at outlet) (m)	Exhaust Temperature (°C)	Emission Exit Velocity (m/sec)	Building Height(m) <sup>1</sup>	Building Width(m) <sup>2</sup>	Vent Type <sup>3</sup>

<sup>1</sup>Height of attached or adjacent building

<sup>2</sup>Width of attached or adjacent building

<sup>3</sup>Use the following codes to designate vent type:

H = Horizontal

V = Vertical

☐ Mark (X) this box if you attach a continuation sheet.

10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09.  
Photocopy this question and complete it separately for each emission point source.

CBI

N/A

☐

Point source ID code .....

Size Range (microns)

Mass Fraction (% ± % precision)

< 1

≥ 1 to < 10

≥ 10 to < 30

≥ 30 to < 50

≥ 50 to < 100

≥ 100 to < 500

≥ 500

Total = 100%

☐ Mark (X) this box if you attach a continuation sheet.



PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... POLYURETHANE FOAM MFG.  
 Percentage of time per year that the listed substance is exposed to this process type ..... 100 %

Equipment Type	Number of Components in Service by Weight Percent of Listed Substance in Process Stream					Greater than 99%
	Less than 5%	5-10%	11-25%	26-75%	76-99%	
Pump seals <sup>1</sup>						
Packed				<u>X</u>		
Mechanical				<u>4</u>		
Double mechanical <sup>2</sup>						
Compressor seals <sup>1</sup>						
Flanges				<u>100</u>		
Valves						
Gas <sup>3</sup>						
Liquid				<u>10</u>		
Pressure relief devices <sup>4</sup> (Gas or vapor only)	<u>4</u>					
Sample connections						
Gas						
Liquid	<u>2</u>					
Open-ended lines <sup>5</sup> (e.g., purge, vent)						
Gas						
Liquid						

<sup>1</sup>List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.

10.13 (continued)

<sup>2</sup>If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

<sup>3</sup>Conditions existing in the valve during normal operation

<sup>4</sup>Report all pressure relief devices in service, including those equipped with control devices

<sup>5</sup>Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

CBI

☐

a. Number of Pressure Relief Devices	b. Percent Chemical in Vessel <sup>1</sup>	c. Control Device	d. Estimated Control Efficiency <sup>2</sup>
4	<5%	SPRING	50%

<sup>1</sup>Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

<sup>2</sup>The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

# NA - LEAK DETECTION PROCEDURE NOT IN PLACE.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... POLYURETHANE FOAM MFG.

Equipment Type	Leak Detection	Detection Device <sup>1</sup>	Frequency of Leak Detection (per year)	Repairs Initiated (days after detection)	Repairs Completed (days after initiated)
	Concentration (ppm or mg/m <sup>3</sup> ) Measured at _____ Inches from Source				
Pump seals					
Packed	_____	_____	_____	_____	_____
Mechanical	_____	_____	_____	_____	_____
Double mechanical	_____	_____	_____	_____	_____
Compressor seals	_____	_____	_____	_____	_____
Flanges	_____	_____	_____	_____	_____
Valves					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Pressure relief devices (gas or vapor only)	_____	_____	_____	_____	_____
Sample connections					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Open-ended lines					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____

<sup>1</sup>Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

10.16 Raw Material, Intermediate and Product Storage Emissions - - Complete the following table by providing the information on each liquid raw material, intermediate, and product storage vessel containing the listed substance as identified in your process block or residual treatment block flow diagram(s).

Vessel Type <sup>1</sup>	Floating Roof <sup>2</sup> Seals	Composition of Stored Materials <sup>3</sup>	Throughput (liters per year)	Vessel Filling Rate (gpm)	Vessel Filling Duration (min)	Vessel Inner Diameter (m)	Vessel Height (m)	Vessel Volume (l)	Operating Vessel Emission Controls <sup>4</sup>	Design Flow Rate <sup>5</sup>	Vent Diameter (cm)	Control Efficiency (%)	Basis for Estimate <sup>6</sup>
F(2)	NA	100% (NONE)	209,217	100	40	2.4	3.5	15800	REL. VAL.	395 <sup>lit</sup> / <sub>min</sub>	2.5	90	C
F(4)	NA	100% (NONE)	209,217	40	5	1	1	1000	REL. VAL.	200 <sup>lit</sup> / <sub>min</sub>	1.25	50	C

<sup>1</sup>Use the following codes to designate vessel type:

F = Fixed roof  
 CIF = Contact internal floating roof  
 NCIF = Noncontact internal floating roof  
 EFR = External floating roof  
 P = Pressure vessel (indicate pressure rating)  
 H = Horizontal  
 U = Underground

<sup>2</sup>Use the following codes to designate floating roof seals:

MS1 = Mechanical shoe, primary  
 MS2 = Shoe-mounted secondary  
 MS2R = Rim-mounted, secondary  
 LM1 = Liquid-mounted resilient filled seal, primary  
 LM2 = Rim-mounted shield  
 LMW = Weather shield  
 VM1 = Vapor mounted resilient filled seal, primary  
 VM2 = Rim-mounted secondary  
 VMW = Weather shield

<sup>3</sup>Indicate weight percent of the listed substance. Include the total volatile organic content in parenthesis

<sup>4</sup>Other than floating roofs

<sup>5</sup>Gas/vapor flow rate the emission control device was designed to handle (specify flow rate units)

<sup>6</sup>Use the following codes to designate basis for estimate of control efficiency:

C = Calculations  
 S = Sampling

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PART E NON-ROUTINE RELEASES

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10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

<u>Release</u>		<u>Date Started</u>	<u>Time (am/pm)</u>	<u>Date Stopped</u>	<u>Time (am/pm)</u>
1	NONE				
2					
3					
4					
5					
6					

---

\*Response not required for TD1

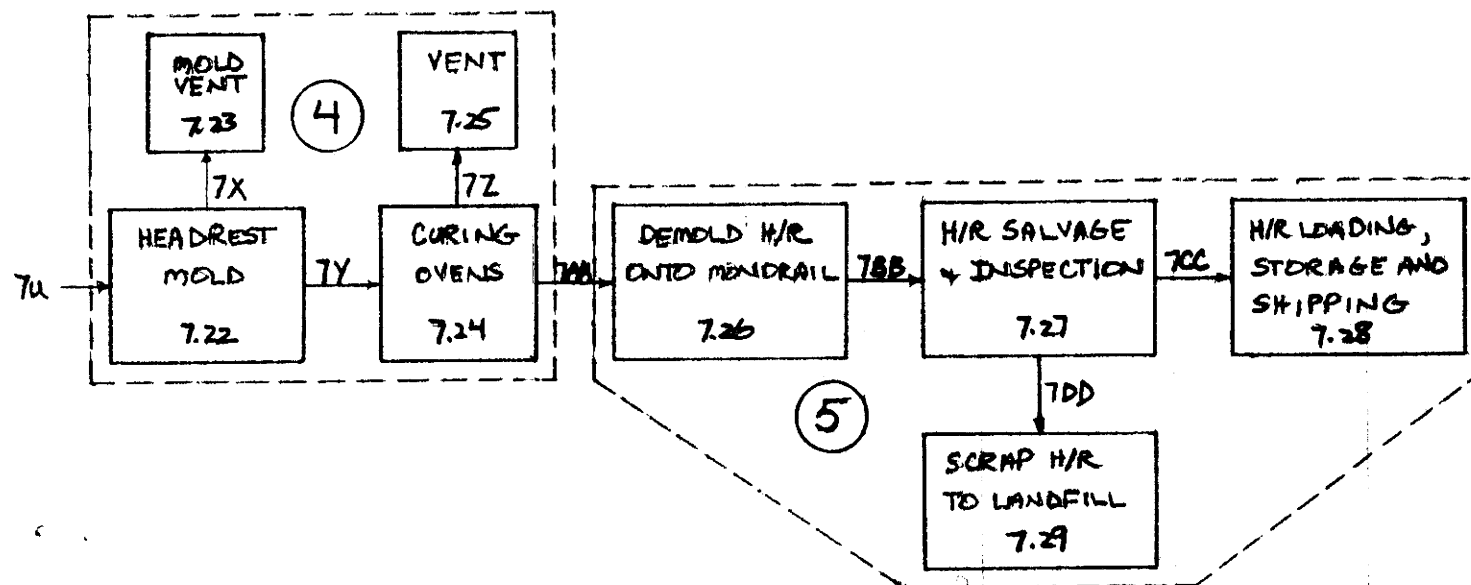
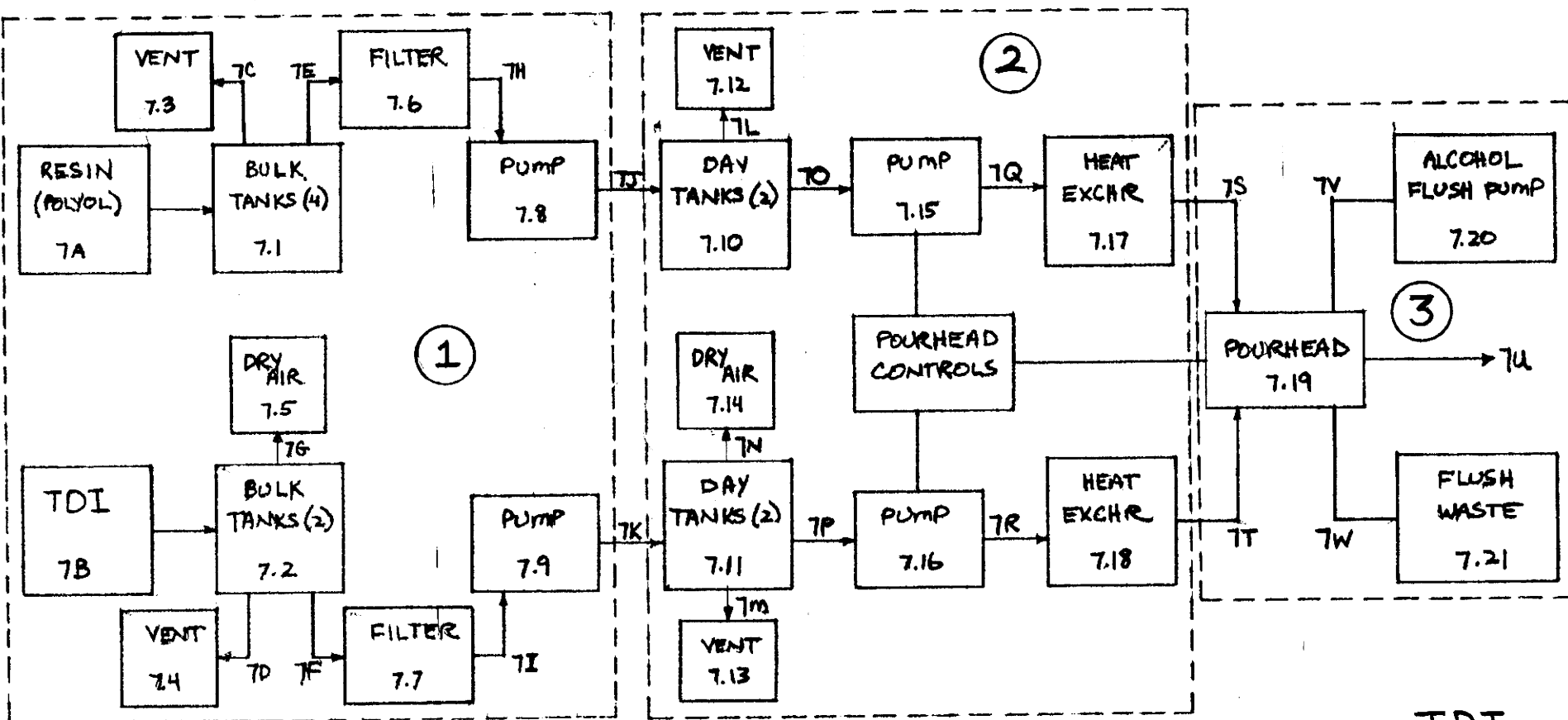
10.24 Specify the weather conditions at the time of each release.

<u>Release</u>	<u>Wind Speed (km/hr)</u>	<u>Wind Direction</u>	<u>Humidity (%)</u>	<u>Temperature (°C)</u>	<u>Precipitation (Y/N)</u>
1					
2					
3					
4					
5					
6					

---

☐ Mark (X) this box if you attach a continuation sheet.

---



## TDI EMISSIONS

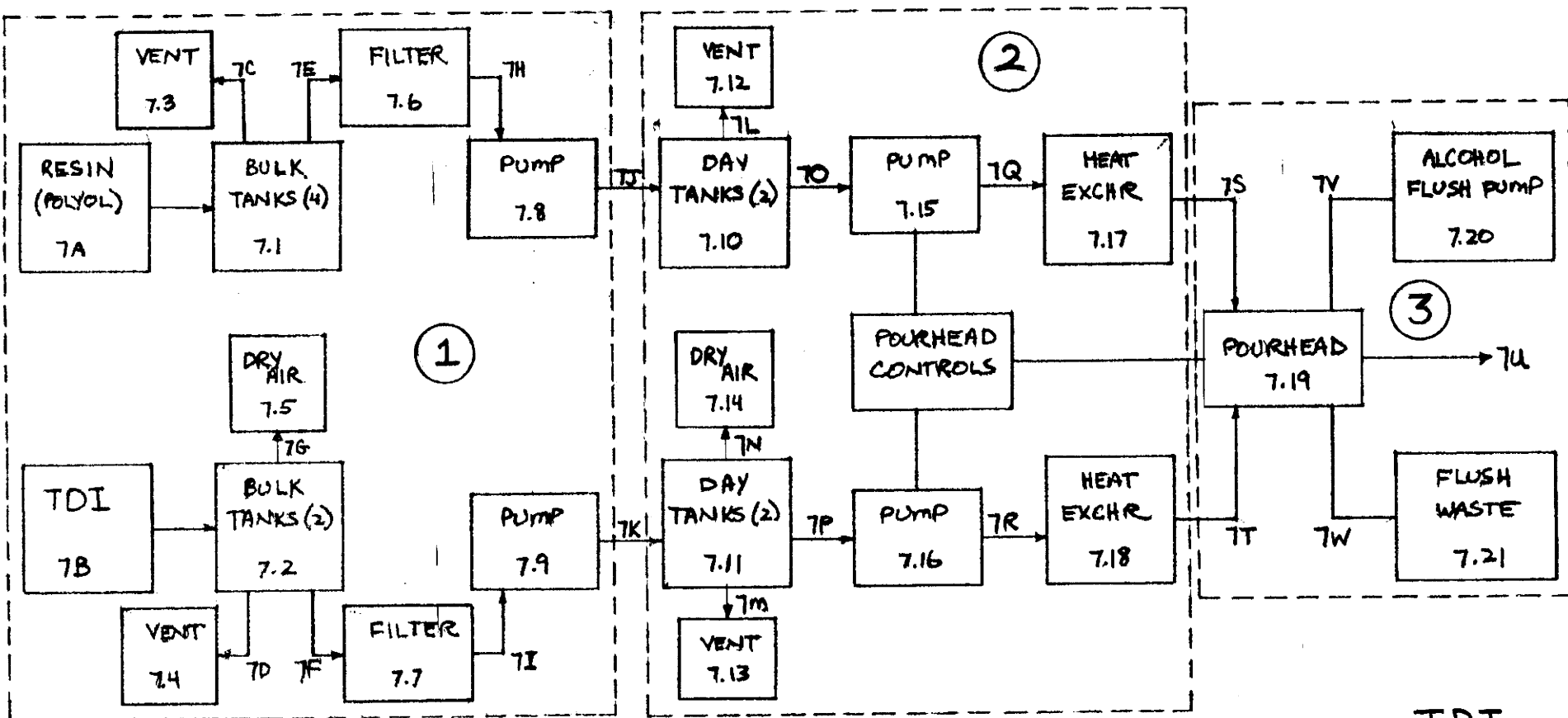
7.4, 7.13 PRESSURE RELIEF VENTING

7.9, 7.16 TDI PUMP SEALS

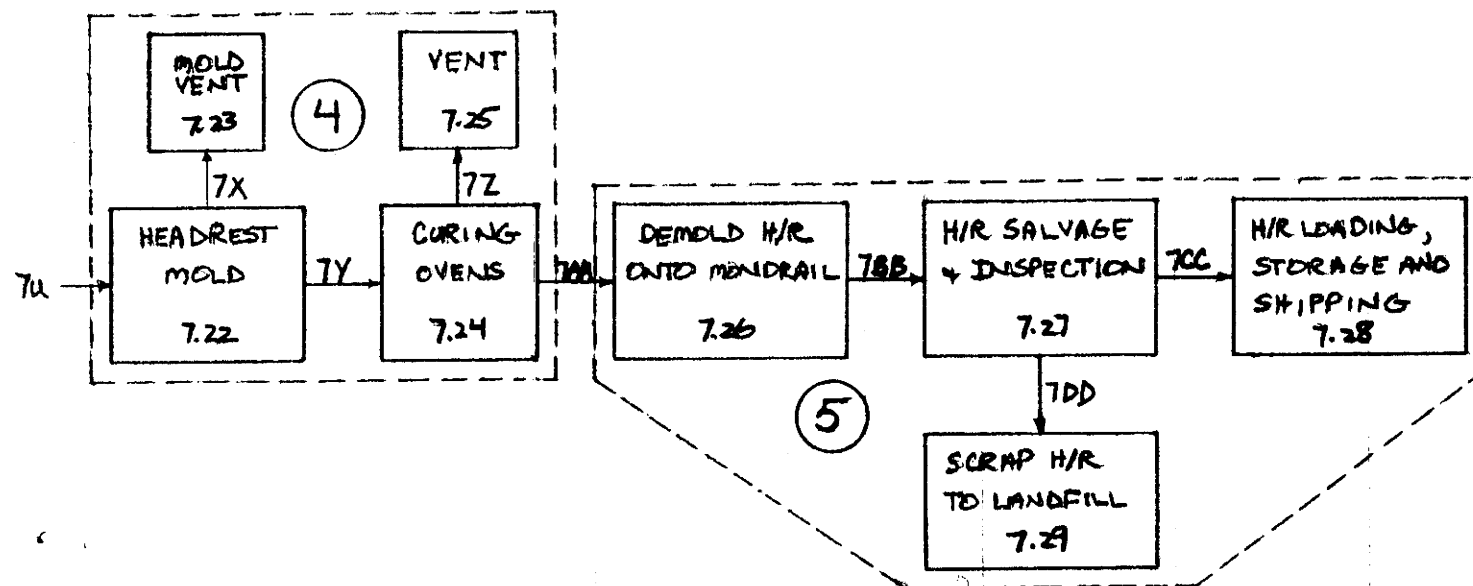
7.19 POURHEAD SEALS

7.23, 7.25 REACTION ZONE / CURING  
OVEN VENTING

7.26-7.28 POST CURE



## TDI EMISSIONS



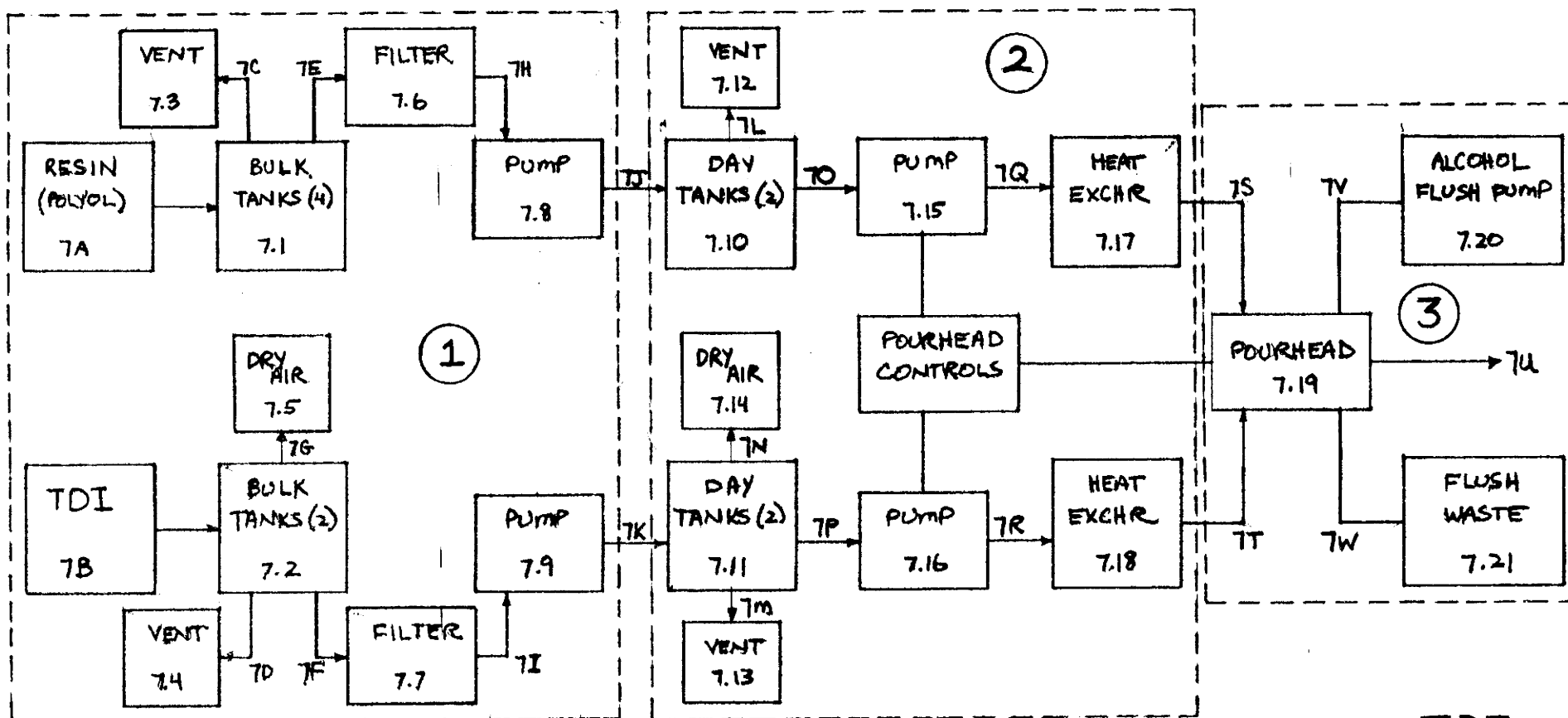
7.4, 7.13 PRESSURE RELIEF VENTING

7.9, 7.16 TDI PUMP SEALS

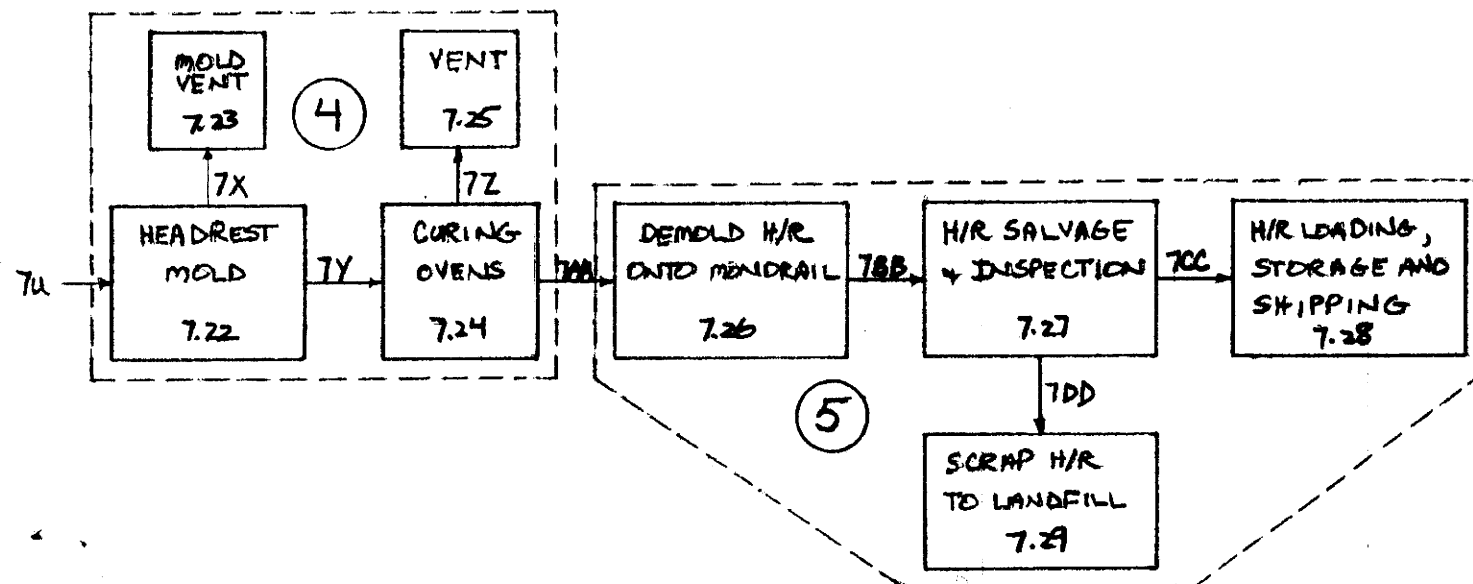
7.19 POURHEAD SEALS

7.23, 7.25 REACTION ZONE / CURING  
OVEN VENTING

7.26-7.28 POST CURE



## TDI EMISSIONS



7.4, 7.13 PRESSURE RELIEF VENTING

7.9, 7.16 TDI PUMP SEALS

7.19 POURHEAD SEALS

7.23, 7.25 REACTION ZONE / CURING  
OVEN VENTING

7.26-7.28 POST CURE